

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
1.	1	SCOPE .	Deleted.					
2.		<p>This Manual and DOE Order 231.1A, Environment, Safety, and Health Reporting, dated 08-19-03, set forth the minimum set of occurrence reporting requirements for Department of Energy (DOE) Departmental Elements, including the National Nuclear Security Administration (NNSA), and contractors responsible for the management and operation of DOE-owned and DOE-leased facilities, including NNSA facilities. These requirements include categorizing occurrences related to safety, environment, health, or operations ("Reportable Occurrences"); notifying DOE of these occurrences; and developing and submitting documented follow-up reports. These occurrence reporting directives further require that the notifications be timely in accordance with the significance of the occurrence, and that the written reports contain appropriate information describing the occurrence, significance, causal factors, and corrective actions. No exemption to this minimum set of occurrence reporting requirements is permitted.</p>	Deleted.	None.	DOE Order 251.1C, Departmental Directives Program does not require a scope statement.	Deleted.		
3.	2	PURPOSE.	OBJECTIVES.		Changed to match Order format.	Changed.		1
4.		<p>This Manual provides detailed information for reporting occurrences and managing associated activities at DOE facilities, including NNSA facilities. It complements DOE O 231.1A, Environment, Safety, and Health Reporting and its use is required by that Order. Information gathered in response to requirements in this Order and Manual is used for analysis of the Department's performance in environmental protection and the safety and health of its workers and the public. This information is also used to develop lessons learned and document events that impact DOE operations.</p>	<p>To ensure that the Department of Energy (DOE) and National Nuclear Security Administration (NNSA) are informed about events that could adversely affect the health and safety of the public or the workers, the environment, DOE missions, or the credibility of the Department. To promote organizational learning consistent with DOE's Integrated Safety Management System goal of enhancing mission safety, and sharing effective practices to support continuous improvement and adaptation to change.</p>	Secretarial mandate in 1990 and continuing need as a component of Integrated Safety Management and Quality Assurance. Supports ISM feedback and improvement function as well as ISO 9001, 14001, and 31000 activities.	To identify the purpose of the Order, including its relationship to Integrated Safety Management.	Changed.		1a, b

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5.		New.	<u>CANCELLATION</u> . Cancellation of a directive does not, by itself, modify or otherwise affect any contractual or regulatory obligation to comply with the directive. Contractor Requirements Documents (CRDs) that have been incorporated into a contract remain in effect throughout the term of the contract unless and until the contract is modified to either eliminate requirements that are no longer applicable or substitute a new set of requirements.	DOE Order 251.1C, Departmental Directives Program requires a cancellation statement.	Requirement for Order.	Added.		2
6.		New.	DOE M 231.1-2, <i>Occurrence Reporting and Processing of Operations Information</i> , dated 8-19-03.	None.	Order replaces the current manual.	Added.		2
7.		New.	DOE G 231.1-1, <i>Occurrence Reporting and Performance Analysis Guide</i> , dated 08-20-03.	None.	Guide will be replaced by an EFCOG document on the same topic.	Added.		2
8.		New.	DOE G 231.1-2, <i>Occurrence Reporting Causal Analysis Guide</i> , dated 08-20-03.	None.	Guide being replaced by a Technical Standard Handbook.	Added.		2
9.	3a.	<u>DOE</u> Elements. Except for the exclusions in paragraph c of this section, this Manual applies to all DOE Elements, including NNSA, as listed in Attachment 1.	<u>Departmental Elements</u> . Except for the exemptions in paragraph 3c, the provisions of this Order apply to all Departmental elements.	Legal status of departmental elements.	Changed verbiage to fit Order.	Changed.	Attachment 1	3a
10.	3a(1), (2)	Where a responsibility or authority is assigned to an organization that is restructured, the responsibility or authority will be reassigned to the appropriate successor organization as explicitly determined by the appropriate Lead Program Secretarial Officer.	Where a responsibility or authority is assigned to an organization that is restructured, the responsibility or authority will be reassigned to the appropriate successor organization as explicitly determined	Legal status of departmental elements.	Changed verbiage to fit Order.	Changed.		3a(1), (2)

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			by the appropriate Lead Program Secretarial Officer. The Administrator of the NNSA must assure that NNSA employees comply with their responsibilities under this directive. Nothing in this directive will be construed to interfere with the NNSA Administrator’s authority under section 3212(d) of Public Law (P.L.) 106-65 to establish Administration specific policies, unless disapproved by the Secretary.					
11.	3b.	Site/Facility Management Contractors.	<u>DOE Contractors.</u>		Changed to fit Order format.	Changed.		3b
12.	3b.(1)	The Contractor Requirements Document (CRD), Attachment 2, sets forth requirements of this Manual that will apply to site/facility management contractors whose contracts include the CRD.	Except for the equivalencies/exemptions in paragraph 3.c, the Contractor Requirements Document (CRD), Attachment 1, sets forth requirements of this Order that will apply to site/facility management contractors whose contracts include the CRD.	DOE O 251.1C.	Fixed Attachment number.	Changed.	Attachment 1 CRD	3b(1)
13.	3b.(2)	Except for the exclusions in paragraph c of this section, this CRD must be included in all site/facility management contracts.	Deleted.	N/A	It is in 3b(1)	Deleted.		
14.	3b.(3)	This Manual does not apply to other than site/facility management contractors. Any application of any requirements of this Manual to other than site/facility management contractors will be communicated separately from this Manual.	This Order applies only to site/facility management contractors. Any application of any requirements of this Order to other than site/facility management contractors will be communicated separately from this Order.	DOE O 251.1C	Changed to fit Order requirements.	Changed.		3b(2)
15.	3b.(4)	The office identified in the Responsibilities section is responsible for telling contracting officers which site/facility management contractors are affected. Once notified, contracting officers are responsible for incorporating the CRD into the contracts of affected site/facility management contractors via the laws, regulations, and DOE directives clause of the	Deleted.	N/A	Standard expectation.	Deleted.		

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		contracts.						
16.	3b.(5)	As the laws, regulations, and DOE directives clause of site/facility management contracts state, regardless of the performer of the work, the site/facility management contractor with the CRD incorporated into its contract is responsible for compliance with the requirements of the CRD. An affected site/facility management contractor is responsible for flowing down the requirements of this CRD to subcontracts at any tier to the extent necessary to ensure the site/facility management contractor’s compliance with the requirements. In doing so, the contractor must not unnecessarily or imprudently flow down requirements to subcontracts. That is, the contractor will both ensure that it and its subcontractors comply with the requirements of this CRD and only incur costs that would be incurred by a prudent person in the conduct of competitive business.	Deleted.	N/A	It is already part of a contract that says that the contractor is responsible for complying with the contract. Including the statement here is redundant.	Deleted.		
17.	3.c	<u>Exclusions.</u>	<u>Equivalencies/Exemptions.</u>		To fit Order format.	Changed.		3c
18.	3c.(1)	Power Marketing Administration reporting of major electrical power outages, disturbances, and fuel shortages subject to the emergency power system reporting requirements prescribed in 10 CFR 205, and 350-354, <i>Report Of Major Electric Utility Systems Emergencies.</i>	<u>Exemption.</u> Power Marketing Administration reporting of major electrical power outages, disturbances, and fuel shortages subject to the emergency power system reporting requirements prescribed in 10 CFR 205, and 350-354, <i>Report Of Major Electric Utility Systems Emergencies.</i>	See ref.	No change.	Retained.	10 CFR 205 10 CFR 350-354	3c(2)
19.	3c.(2)	Activities under the authority of the Director, Naval Nuclear Propulsion, pursuant to Executive Order 12344, as set forth in Public Laws 98-525 and 106-65.	<u>Equivalency.</u> In accordance with the responsibilities and authorities assigned by Executive Order 12344, codified at Title 50 United States Code (USC) sections 2406 and 2511 and to ensure consistency through the joint Navy/DOE Naval Nuclear Propulsion Program, the Deputy Administrator for Naval Reactors (Director) will implement and oversee requirements and practices pertaining to this Directive for	See ref.	Updated existing language to current language.	Changed.	Executive Order 12344 50 USC sections 2406 and 2511	3c(1)

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			activities under the Director's cognizance, as deemed appropriate, with the exception of reporting required by 29 Code of Federal Regulations (CFR) Part 1960.					
20.	4	RESPONSIBILITIES.	<u>RESPONSIBILITIES.</u>					Section 5
21.	4	The following provides primary responsibilities for implementation of the Occurrence Reporting Program. Other specific responsibilities are provided elsewhere in the Manual.	Deleted.	N/A	Unnecessary verbiage.	Deleted.		Section 5
22.	4.1	<u>Assistant Secretary for Environment, Safety and Health.</u>	<u>Chief Health, Safety and Security Officer.</u>	Information.	Updated office name.	Changed.		5b
23.	4.1a	Develops, promulgates, and maintains policies to implement and sustain an effective Occurrence Reporting Program, including the computerized Occurrence Reporting and Processing System.	Develop, promulgate, and maintain policies to implement and sustain an effective Occurrence Reporting Program, including the computerized Occurrence Reporting and Processing System.	Necessary to support ORPS process.	Fixed verb plurality.	Changed.		5b(1)
24.	4.1b	Provides formal Departmental interpretation of the requirements of this Manual, in coordination with the Secretarial Offices and the National Nuclear Security Administration (NNSA) for NNSA facilities.	Provide formal Departmental interpretation of the requirements of this Order, in coordination with the Secretarial Offices and the National Nuclear Security Administration (NNSA) for NNSA facilities.	Necessary to support ORPS process.	Fixed verb plurality.	Changed.		5b(2)
25.	4.1c	Develops, promulgates, and maintains guidance materials, and conducts workshops, as necessary, for implementing the requirements of this Manual.	Develop, promulgate, and maintain guidance materials, and conduct workshops, as necessary, for implementing the requirements of this Order.	Necessary to support ORPS process.	Fixed verb plurality.	Changed.		5b(3)
26.	4.1d	Monitors reports relative to reporting activities at DOE facilities to assess implementation of this Manual and to identify needed improvements.	Monitor reports relative to reporting activities at DOE facilities to assess implementation of this Order and to identify needed improvements.	HSS role in feedback and improvement process.	Fixed verb plurality.	Changed.		5b(4)
27.	4.1e	Monitors and audits implementation of this Manual related to the Office of Environment, Safety and Health functional areas of responsibility.	Monitor and audit implementation of this Order related to the Office of Health, Safety and Security.	Necessary to support ORPS process.	Fixed verb plurality and updated office name.	Changed.		5b(5)
28.	4.1f	Periodically analyzes occurrence reporting data to identify significant issues and trends across the Department.	Periodically analyze occurrence reporting data to identify significant issues and trends across the Department.	HSS role in feedback and improvement process.	Fixed verb plurality.	Changed.		5b(6)

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29.	4.1g	In conjunction with the Chief Information Officer, operates, maintains, and further develops the supporting computer data system, the Occurrence Reporting and Processing System (ORPS).	In conjunction with the Chief Information Officer, operate, maintain, and further develop the supporting computer data system, the Occurrence Reporting and Processing System (ORPS).	Necessary to support ORPS process.	Fixed verb plurality.	Changed.		5b(7)
30.	4.2	<u>Secretarial Officers/Deputy Administrators (NNSA).</u>	<u>Secretarial Officers/Deputy Administrators (NNSA).</u>		No change.	Retained.		5a
31.	4.2a	Delegate responsibilities and authority for implementing this Manual, including designating Program Managers.	Delegate responsibilities and authority for implementing this Order, including designating Program Managers.	Necessary to support ORPS process.	Document was converted from a Manual to an Order.	Changed.		5a(1)
32.	4.2b	Establish agreements with Heads of Field Elements to ensure support for the Facility Representative and Program Manager in accordance with this Manual.	Deleted.	N/A	Normal expectation of management and oversight functions.	Deleted.		
33.		New.	Review activities related to reportable occurrences, including reporting and the development of programs and procedures.	Role in feedback and improvement process.	Requirement added to review activities and program development.	Added.		5a(2)
34.		New.	Ensure that a system for Prompt Notification and categorization of reportable occurrences has been established for their DOE programs and for facilities under their cognizance.	Necessary to support ORPS process.	Requirement added to ensure that Prompt Notification and occurrence categorization takes place.	Added.		5a(3)
35.	4.2c	Review occurrence reporting data and identify circumstances that are indicative of deteriorating or poor program performance in their respective areas of authority.	Review occurrence reporting data and identify potential performance gaps that are indicative of the need for further study and evaluation.	Role in feedback and improvement process.	Slight verbiage change.	Changed.		5a(4)
36.	4.2d	Provide the Headquarters Operations Center (HQ OC) with a prioritized list of emergency management duty officers and their contact numbers to permit notification on a 24 hour-a-day, 7 day-a-week basis.	Provide the Headquarters Operations Center (HQ OC) with a prioritized list of emergency management duty officers and their contact numbers to permit notification on a 24 hour-a-day, 7 day-a-week basis.	Necessary to support ORPS process.	No change.	Retained.		5a(5)
37.	4.2e	Ensure training programs are established for both DOE and contractor personnel.	Ensure that DOE and contractor personnel are trained in the requirements of this directive.	Necessary to support ORPS process.	Slight verbiage change.	Changed.		5a(6)
38.	4.2f	Ensure the requirements in the CRD for DOE M 231.1-2 are applied to applicable contracts within 3 months after approval	Ensure the requirements in the CRD are applied to applicable contracts	Necessary to support ORPS process.	Slight verbiage change to eliminate	Changed.		5a(7)

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		of this Order.	within 3 months after approval of this Order.		reference to the Manual..			
39.	4.2g	Ensure initiators of procurement requests identify in procurement requests whether the requirements in the CRD for DOE M 231.1-2 are to be applied to the award or sub awards resulting from the procurement request and any special instructions for the application of the CRD.	Deleted.	N/A	Normal expectation of management and oversight functions.	Deleted.		
40.	4.3	<u>Director, Office of Security</u>	Deleted.		Deleted requirements for office.	Deleted.		
41.	4.3a	Formulates Department-wide policy regarding the protection and control of both classified matter and unclassified controlled information, which includes Official Use Only and Unclassified Controlled Nuclear Information (UCNI) policy.	Deleted.	N/A	Normal expectation of management and oversight functions.	Deleted.		
42.	4.3b	Resolves any security issues with respect to occurrence reporting.	Deleted.	N/A	Normal expectation of management and oversight functions.	Deleted.		
43.	4.3c	<u>Director, Office of Operations Support.</u>	<u>Deleted.</u>	N/A	Moved requirements to current Office.	Deleted		
44.	4.3c.1	Maintains a 24-hour-a-day/7-day-a-week capability at the DOE HQ OC to receive and log Operational Emergency notifications per DOE O 151.1A, <i>Comprehensive Emergency Management System</i> , to process Prompt Notifications of Significance Category 1 Reportable Occurrences, and to process Prompt Notifications of other occurrences requiring immediate notification to DOE HQ from Departmental Operations/Field/Site Offices and facilities per this Manual.	Maintain a 24-hour-a-day/7-day-a-week capability at the DOE HQ Operations Center (OC) to receive and log Operational Emergency notifications per DOE O 151.1C, <i>Comprehensive Emergency Management System</i> , and to process Prompt Notifications of reportable occurrences.	Necessary to support ORPS process.	Corrected Order number and made minor word changes.	Changed.		5c(1)
45.	4.3c.1.a)	Receives Prompt Notifications of Operational Emergencies orally.	Deleted.	N/A	Unnecessary detail.	Deleted.		
46.	4.3c.1.b)	Receives by e-mail the Prompt Notifications of Significance Category 1 Reportable Occurrences and other occurrences requiring immediate notification to DOE HQ	Deleted.	N/A	Unnecessary detail.	Deleted.		
47.	4.3c.1.c)	When called as follow-up to an e-mail notification, confirms the receipt of the e-mail transmitting the Prompt Notification of Significance Category 1 Reportable Occurrences and other occurrences requiring immediate notification to DOE HQ	Deleted.	N/A	Unnecessary detail.	Deleted.		

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48.	4.3c.2	Logs receipt of all Prompt Notifications and immediately conducts oral notifications to the emergency management duty officer of the Secretarial Officers/Deputy Administrators (NNSA) with responsibility for the facility, site, or activity involved in the operational emergency or occurrence.	Log receipt of all Prompt Notifications and immediately conduct oral notifications to the emergency management duty officer of the Secretarial Officers/Deputy Administrators (NNSA) with responsibility for the facility, site, or activity involved in the operational emergency or occurrence.	Necessary to support ORPS process.	Fixed verb plurality.	Changed.		5c(2)
49.	4.3c.2.a)	The DOE HQ OC will immediately call the appropriate emergency management duty officer and provide information from the Prompt Notification. Notifications by the DOE HQ OC will be made for all Operational Emergencies, Significance Category 1 Reportable Occurrences, and other occurrences requiring immediate notification to DOE HQ regardless of the time or day of the week.	Deleted.	N/A	Unnecessary detail.	Deleted.		
50.	4.3c.2.b)	The DOE HQ OC will forward an e-mail copy of Prompt Notifications of Significance Category 1 Reportable Occurrences, and other occurrences requiring immediate notification of DOE HQ to the emergency management duty officer who was called.	Deleted.	N/A	Unnecessary detail.	Deleted.		
51.	4.4	<u>Director, Office of Emergency Operations, NNSA</u>	<u>NNSA Associate Administrator for Emergency Operations</u>		Updated to current office name.	Changed.		5c
52.	4.4a	Develops, promulgates, and maintains policies related to reporting criteria, classifications, definitions, and prompt notification requirements for Operational Emergencies.	Develop, promulgate, and maintain policies related to reporting criteria, classifications, definitions, and prompt notification requirements for Operational Emergencies.	Necessary to support ORPS process.	Fixed verb plurality.	Changed.		5c(3)
53.	4.4b	Provides formal Departmental interpretation of the requirements for classifying Operational Emergencies.	Deleted.	N/A	Normal expectation of management and oversight functions.	Deleted.		
54.	4.4c	Develops, promulgates, and maintains guidance materials, and conducts workshops, as necessary, on identification and classification of Operational Emergencies.	Develop, promulgate, and maintain guidance materials, and conduct workshops, as necessary, on identification and classification of Operational Emergencies.	Necessary to support ORPS process.	Fixed verb plurality.	Changed.		5c(3)

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55.	4.4d	Monitors reports relative to reporting activities at DOE facilities to assess implementation of the Operational Emergency portion of the Occurrence Reporting Program and to identify needed improvements.	Monitor reports relative to reporting activities at DOE facilities to assess implementation of the Operational Emergency portion of the Occurrence Reporting Program and to identify needed improvements.	Role in feedback and improvement process.	Fixed verb plurality.	Changed.		5c(4)
56.	4.5	<u>Heads of Field Elements.</u>	<u>Heads of Field Elements.</u>		No change.	Retained.		5e
57.	4.5a	Ensure that agreements are established with responsible Secretarial Officers or Deputy Administrators (NNSA) on the working relationship between the Secretarial Officer or Deputy Administrator and the Field Element for the purpose of carrying out the requirements of this Manual.	Deleted.	N/A	Normal expectation of management and oversight functions.	Deleted.		
58.	4.5b	Assess capability and performance of the facility personnel in carrying out the requirements of this Manual, in accordance with established agreements with the responsible Secretarial Officers or Deputy Administrators (NNSA).	Assess performance of facility personnel in carrying out the requirements of this Order, in accordance with established agreements with the responsible Secretarial Officers or Deputy Administrators (NNSA).	Necessary to support ORPS process.	Document was converted from a Manual to an Order.	Changed.		5d(1)
59.	4.5c	Provide technical support as necessary to Facility Representatives and line management staff in responding to any reportable occurrence, in accordance with established agreements with the responsible Secretarial Officers or Deputy Administrators (NNSA).	Deleted.	N/A	Normal expectation of management and oversight functions.	Deleted.		
60.	4.5d	Designate and direct Facility Representatives and Designees to fulfill the responsibilities required by this Manual.	Designate and direct Facility Representatives and Designees to fulfill the responsibilities required by this Order.	Necessary to support ORPS process.	Document was converted from a Manual to an Order.	Changed.		5d(2)
61.	4.5e	Ensure the requirements in the CRD for DOE M 231.1-2 are applied to applicable contracts within 3 months after approval of this Order.	Identify contracts to which the CRD should apply and notify the cognizant contracting officers.	Necessary to support ORPS process.	No change.	Retained.		5d(3)
62.	4.5f	Ensure initiators of procurement requests identify in procurement requests whether the requirements in the CRD for DOE M 231.1-2 are to be applied to the award or sub awards resulting from the procurement request and any special instructions for the application of the CRD.	Ensure initiators of procurement requests identify in procurement requests whether the requirements in the CRD for this Order are to be applied to the award or sub awards resulting from the procurement request and any special instructions for the application of the CRD.	Necessary to support ORPS process.	Document was converted from a Manual to an Order.	Changed.		5d(4)

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63.	4.6	<u>Program Managers.</u> In addition to other requirements prescribed by this Manual, Program Managers are responsible for the following:	<u>Program Managers</u> (as defined in this Order; see definition in Attachment 6).		Removed instructive words and added reference to the Definitions.	Changed.		5e
64.	4.6a	Reviewing activities related to reportable occurrences, including reporting and the development of programs and procedures.	Review activities related to reportable occurrences, including reporting and the development of programs and procedures.	Role in feedback and improvement process.	Changed verb style.	Changed.		5e(1)
65.	4.6b	Ensuring that a system for Prompt Notification and categorization of reportable occurrences has been established for their DOE programs and for facilities under their cognizance.	Ensure that a system for Prompt Notification and categorization of reportable occurrences has been established for their DOE programs and for facilities under their cognizance.	Necessary to support ORPS process.	Changed verb style.	Changed.		5e(2)
66.	4.6c	Ensuring that the Headquarters Operations Center (HQ OC) is informed of how the Headquarters Program Manager or Designees can be reached at all times.	Ensure that the Headquarters Operations Center (HQ OC) is informed of how the Headquarters Program Manager or Designees can be reached at all times.	Necessary to support ORPS process.	Changed verb style.	Changed.		5e(3)
67.	4.6d	Ensuring that lessons learned and generic or programmatic implications are identified and elevated to the Secretarial Officer or Deputy Administrator (NNSA) for appropriate action.	Deleted.	N/A	Included in O 210.2A and ISM.	Deleted.		
68.	4.6e	Ensuring that actions are taken to prevent recurrence of significant events.	Deleted.	N/A	Normal expectation of management and oversight functions. Also included in O 226.1 and ISM.	Deleted.		
69.	4.6f	Reviewing and assessing reportable occurrence information from facilities under their cognizance to assess the Facility Manager's and Facility Representative's evaluation of significance, causes, generic implications, and corrective actions implementation and closeout, and to ensure that DOE and contractor staff involved in these operations perform the related functions.	Deleted.	N/A	Normal expectation of management and oversight functions. Also included in O 226.1 and ISM.	Deleted.		
70.	4.6g	Ensuring that Occurrence Reports and operations information from other organizations are disseminated to appropriate DOE and contractor activities within their cognizance, are reviewed for generic implications, and are used to improve operations.	Ensure that Occurrence Reports and operations information from other organizations are disseminated to appropriate DOE and contractor activities within their cognizance, are reviewed for generic implications, and are	Role in feedback and improvement process.	Changed verb style.	Changed.		5e(4)

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			used to improve operations.					
71.	4.6h	Ensuring that Occurrence Reports are prepared and transmitted in accordance with DOE information security requirements (see Section 7).	Deleted.	N/A	Normal expectation of management and oversight functions. Also included in O 226.1 and ISM.	Deleted.		
72.	4.6i	Notifying the cognizant Secretarial Officer or Deputy Administrator (NNSA) of all Significance Category 1 Occurrences.	Notify the cognizant Secretarial Officer or Deputy Administrator (NNSA) of all Significance Category 1 Occurrences.	Necessary to support ORPS process.	Changed verb style.	Changed.		5e(5)
73.	4.6j	Interacting with the Facility Representative and HQ oversight organizations as necessary, and inform and advising their respective management of their findings.	Deleted.	N/A	Normal expectation of management and oversight functions. Also included in O 226.1 and ISM.	Deleted.		
74.	4.6k	Elevating any unresolved issues regarding actions or determinations on a reportable occurrence to the Secretarial Officer or Deputy Administrator (NNSA) and, if necessary, the Secretary for resolution and direction.	Elevate any unresolved issues regarding actions or determinations on a reportable occurrence to the Secretarial Officer or Deputy Administrator (NNSA) and, if necessary, the Secretary for resolution and direction.	Role in feedback and improvement process.	Changed verb style.	Changed.		5e(6)
75.	4.7	<u>Facility Representatives.</u> In addition to other requirements prescribed in this Manual, Facility Representatives or designee, or selected line management staff if a Facility Representative is not assigned, are responsible for the following:	<u>Facility Representatives</u> (as defined in this Order; see definition in Attachment 6). In addition to other requirements prescribed in this Order, Facility Representatives or designee, or selected line management staff if a Facility Representative is not assigned, are responsible for the following:	Preamble.	Document was converted from a Manual to an Order. Added reference to the Definitions.	Changed.		5f
76.	4.7a	Evaluating facility implementation of the notification and reporting process to ensure it is compatible with and meets the requirements of this Manual.	Evaluate facility implementation of the notification and reporting process to ensure it is compatible with and meets the requirements of this Order.	Necessary to support ORPS process.	Changed verb style. Document was converted from a Manual to an Order.	Changed.		5f(1)

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77.	4.7b	Maintaining day-to-day operational oversight of contractor activities, as described in DOE-STD-1063-2000, <i>Facility Representatives</i> .	Deleted.	N/A	Required by DOE-STD-1063-2000, <i>Facility Representatives</i> .	Deleted.		
78.	4.7c	Ensuring that occurrences that may have generic or programmatic implications are identified and elevated to the Head of the Field Element for appropriate action.	Ensure that occurrences that may have generic or programmatic implications are identified and elevated to the Head of the Field Element for appropriate action.	Role in feedback and improvement process.	Changed verb style.	Changed.		5f(2)
79.	4.7d	Ensuring that facility personnel act to minimize and prevent recurrence of significant events.	Deleted.	N/A	Normal expectation of management and oversight functions. Also included in O 226.1 and ISM.	Deleted.		
80.	4.7e	Reviewing and assessing reportable occurrence information from facilities under their cognizance to determine the acceptability of the Facility Manager’s evaluation of the significance, causes, generic implications, and corrective action implementation and closeout, and to ensure that facility personnel involved in these operations perform the related functions.	Review and assess reportable occurrence information from facilities under their cognizance to determine the acceptability of the Facility Manager’s evaluation of the significance, causes, generic implications, and corrective action implementation and closeout, and to ensure that facility personnel involved in these operations perform the related functions.	Role in feedback and improvement process.	Changed verb style.	Changed.		5f(3)
81.	4.7f	Ensuring that Occurrence Reports are prepared and transmitted in accordance with DOE information security requirements (see Section 7).	Deleted.	N/A	Normal expectation of management and oversight functions. Also included in O 226.1 and ISM.	Deleted.		
82.	4.7g	Interacting with facility personnel and Field Element oversight organizations as necessary and informing and advising their respective managements of their findings.	Deleted.	N/A	Normal expectation of management and oversight functions. Also included in O 226.1 and ISM.	Deleted.		
83.	4.7h	Elevating any unresolved issues regarding actions or determinations on a reportable occurrence to the Program Manager for resolution and direction.	Elevate any unresolved issues regarding actions or determinations on a reportable occurrence to the Program Manager for resolution and direction.	Role in feedback and improvement process.	Changed verb style.	Changed.		5f(4)

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84.	4.7i	Being available at all times to satisfy the requirements of this Manual.	Deleted.	N/A	Normal expectation of management and oversight functions. Also included in O 226.1 and ISM.	Deleted.		
85.	4.8	<u>Facility Managers.</u> In addition to other requirements prescribed in this Manual, Facility Managers are responsible for the following:	<u>Facility Managers</u> (as defined in this Order; see definition in Attachment 6). In addition to other requirements prescribed in this Order, Facility Managers are responsible for the following:		Document was converted from a Manual to an Order. Added reference to the Definitions.	Changed.		5g
86.	4.8a	Ensuring procedures are implemented for notification and reporting that meet the requirements of this Manual.	Ensure procedures are implemented for notification and reporting that meet the requirements of this Order.	Necessary to support ORPS process.	Changed verb style. Document was converted from a Manual to an Order.	Changed.		5g(1)
87.	4.8b	Actively monitoring day-to-day operations and performance of facilities/activities under their cognizance.	Deleted.	N/A	Normal expectation of management and oversight functions. Also included in O 226.1.	Deleted.		
88.	4.8c	Identifying and sharing with others lessons learned and generic or programmatic implications from occurrences and taking actions to minimize or prevent recurrence.	Deleted.	N/A	Included in O 210.2A and ISM.	Deleted.		
89.	4.8d	Determining causes and generic implications, and implementing corrective actions and closeout activities for reportable occurrences.	Determine causes and generic implications, and implement corrective actions and closeout activities for reportable occurrences.	Role in feedback and improvement process.	Slight verb changes.	Changed.		5g(2)
90.	4.8e	Reviewing and assessing reportable occurrence information for their facility(ies) to assess generic implications and corrective action(s) implementation, closeout, and effectiveness, as required; to identify and report recurring events, and to ensure that facility personnel involved in these operations perform the related functions.	Review and assess reportable occurrence information for their facilities to assess generic implications and corrective action implementation, closeout, and effectiveness, as required; to identify and report recurring events, and to ensure that facility personnel involved in these operations perform the related functions.	Role in feedback and improvement process.	Slight verb changes.	Changed.	ISM, QA, ISO documents	5g(3)

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
91.	4.8f	Ensuring that Occurrence Reports and operations information from other organizations are disseminated to appropriate facility personnel within their cognizance, are reviewed for generic implications, and are used to improve operations.	Ensure that Occurrence Reports and operations information from other organizations are disseminated to appropriate facility personnel within their cognizance, are reviewed for generic implications, and are used to improve operations.	Role in feedback and improvement process.	Slight verb changes.	Changed.		5g(4)
92.	4.8g	Preparing and transmitting Occurrence Reports in accordance with DOE information security requirements (see Section 7).	Prepare and transmit Occurrence Reports in accordance with Order requirements.	Necessary to support ORPS process.	Slight verb changes and broadened to apply to all Order requirements.	Changed.		5g(5)
93.	4.8h	Being available at all times to satisfy the requirements of this Manual.	Deleted.	N/A	It is redundant to tell people they have expectations and then to tell them they have to be available to accomplish the expectations.	Deleted.		
94.		New.	Contracting Officers. Incorporate the CRD into contracts in a timely fashion upon notification of its applicability.	Contracting requirement.	Requirement to get Order into contracts.	Added.		5.h
95.	5	OCCURRENCE REPORTING.	<u>REQUIREMENTS.</u>		Changed to Order format.	Changed.		4
96.	5	To implement the occurrence categorization, notification, reporting, and processing system, the key responsible personnel must be identified and procedures developed, approved, and implemented to ensure that all of the occurrence reporting requirements, as delineated in DOE O 231.1A and this Manual, are met.	To ensure that the Department of Energy (DOE) and National Nuclear Security Administration (NNSA) are informed about events that could adversely affect the health and safety of the public or the workers, the environment, DOE missions, or the credibility of the Department.		Moved to identify the objectives of the Order.	Moved.	DOE O 232.1 A	1a
97.	5	The Facility Manager must be available at all times to carry out the responsibilities for the categorization, notification, and reporting requirements.	Deleted.	N/A	This is a given if the actual reporting criteria are otherwise met. No need to state this for the contractor or the field elements.	Deleted.		

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
98.	5	Facility operators are required to ensure that occurrences resulting from activities performed by subcontractors in support of facility operation are reported in accordance with the provisions of this Manual.	Occurrences resulting from activities performed by facility personnel and by subcontractors in support of facility operation must be reported in accordance with the provisions of this Order.	Necessary to support ORPS process.	Document was converted from a Manual to an Order.	Changed.		4a(1)
99.	5	For reportable occurrences, facility personnel are required to categorize the occurrences, notify DOE as required, and prepare and submit Occurrence Reports.	For reportable occurrences, facility personnel must categorize the occurrences, notify other DOE elements as required, and prepare and submit Occurrence Reports.	Necessary to support ORPS process.	No change.	Retained.		4a(2)
100.	5	Occurrences involving foreign personnel, governments, organizations, entities or influence must be reported by the Facility Manager to the Office of Counterintelligence or the Office of Defense Nuclear Counterintelligence, as appropriate.	Occurrence reports involving incidents of counterintelligence concern (e.g., foreign persons, governments, organizations, entities or influence) must not be entered or referenced in the ORPS database.	Necessary to support ORPS process.	Changed to just state the requirement. Moved security requirements to Attachment 4.	Changed and moved.		Attachment 4 - 1.c
101.	5.2	Local implementing procedures may increase the reporting requirements but may not decrease the requirements below.	Local implementing procedures may specify additional learning and reporting requirements beyond those stated in this Order, but must at a minimum include all of the requirements in this Order.	Necessary to support ORPS process.	Moved statement to General Requirements for visibility.	Moved.		4a(3)
102.	5.1	<u>Event or Condition Identification.</u>	<u>Event or Condition Identification and Response.</u>		Verbiage change to include response.	Changed.		4c
103.	5.1.a	Occurrences may be identified by direct observation of equipment or process malfunctions, log or record reviews, operator recognition of their own or others' errors, or other means.	DOE O 422.1, <i>Conduct of Operations</i> , and DOE 151.1C, <i>Comprehensive Emergency Management System</i> , specify requirements for identifying and responding to emergencies and abnormal events. Locally approved processes and procedures that implement those requirements must ensure that the requirements of this Order for reporting are initiated for events specified in the Occurrence Reporting Criteria (Attachment 2) of this Order.	Referred to other Orders for how occurrences can be identified.	The current version gives ideas of how things "may" be identified. The value is questionable. Therefore a reference to other Orders seems more appropriate.	Changed.	DOE O 422.1 and DOE 151.1 C	4c.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
104.	5.1.b	Operations personnel must take appropriate immediate action to stabilize and/or place the facility/operation in a safe condition and ensure that any potential environmental effects are stabilized and workers are treated for injuries sustained.	Deleted.	N/A	The Orders referenced in 4.c better define the requirements. Implementation of the requirements is determined by each site.	Deleted.		
105.	5.1.b	Also, actions should be taken to preserve conditions for continued investigation; however, these actions are not to interfere with establishing a safe condition.	Deleted.	N/A	The Orders referenced in 4.c better define the requirements. Implementation of the requirements is determined by each site.	Deleted.		
106.	5.1.c	The facility staff and operators must, upon identification of an abnormal or suspected abnormal event or condition, promptly notify the appropriate line management and the Facility Manager of the event status and record and/or archive all pertinent information, including details concerning the discovery of the occurrence and actions taken to stabilize or place the facility/operation in a safe condition.	Deleted.	N/A	The Orders referenced in 4.c better define the requirements. Implementation of the requirements is determined by each site.	Deleted.		
107.	5.2	<u>Event or Condition Categorization</u> . The Facility Manager must categorize all occurrences, except Operational Emergencies, within 2 hours of discovery by the cognizant facility staff following the site/facility-specific procedures developed in accordance with Section 9 of this Manual. The significance categories, as outlined in the Occurrence Reporting Model (Section 11), are for those occurrences of interest for complex-wide occurrence reporting and are described very generally below. More definitively, Section 6, Reporting Criteria, provides very specific reporting criteria and assigns the appropriate significance category to each criterion. Local implementing procedures may increase the reporting requirements but may not decrease the requirements below.	<u>Event or Condition Categorization</u> . Events and conditions must be categorized in accordance with the Occurrence Reporting Criteria (Attachment 2) and within the timeframes specified in the Occurrence Reporting Model. (Attachment 4), or as soon thereafter as reasonably possible.	Necessary to support ORPS process.	The proposed Order moves the Model to Attachment 4 and the Reporting Criteria to Attachment 2. The language describing the different significance categories is removed.	Changed.	Attachment 2 and 4	4d

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
108.	5.2.a	<u>Operational Emergencies (OE).</u> Operational Emergencies are defined in DOE O 151.1A, <i>Comprehensive Emergency Management System</i> . Operational Emergency Occurrences are the most serious occurrences and require an increased alert status for onsite personnel and, in specified cases, for offsite authorities. The prompt notification requirements, definitions, criteria, and classifications of operational emergencies and appropriate responses are provided in DOE O 151.1A. Written Occurrence Reports must be completed in accordance with this Manual.	Operational Emergency (OE) as defined in DOE O 151.1C: Major unplanned or abnormal events or conditions that: involve or affect DOE/NNSA facilities and activities by causing, or having the potential to cause, serious health and safety or environmental impacts; require resources from outside the immediate/affected area or local event scene to supplement the initial response; and, require time-urgent notifications to initiate response activities at locations beyond the event scene. Operational Emergencies are the most serious occurrences and require an increased alert status for onsite personnel and, in specified cases, for offsite authorities.	Necessary to support ORPS process.	Specifics are already contained in the Occurrence Reporting Model, Attachment 4.	Changed and moved.	DOE O 151.1 A	Attach ment 2 – 1.b.
109.	5.2.b	<u>Significance Category 1.</u> Occurrences in this category are those that are not Operational Emergencies and that have a <i>significant impact</i> on safe facility DOE M 231.1-2 Page 11 08-19-03 operations, worker or public safety and health, regulatory compliance, or public/business interests.	Significance Category 1: Non-OE events that caused actual harm; posed the potential for immediate harm or mission interruption due to safety system failure and required prompt mitigative action; or constituted a clear breach of regulatory compliance.	Necessary to support ORPS process.	Specifics are already contained in the Occurrence Reporting Model, Attachment 4.	Changed and moved.		Attach ment 2 – 1.c.
110.	5.2.c	<u>Significance Category R.</u> Occurrences in this category are those identified as recurring, as determined from the periodic performance analysis of occurrences across a site.	Significance Category R: Recurring occurrences are those identified as recurring, either directly or through periodic analysis of occurrences and other non-reportable events.	Necessary to support ORPS process.	Specifics are already contained in the Occurrence Reporting Model, Attachment 4.	Changed and moved.		Attach ment 2 – 1.g.
111.	5.2.d	<u>Significance Category 2.</u> Occurrences in this category are those that are not Operational Emergencies and that have a <i>moderate impact</i> on safe facility operations, worker or public safety and health, regulatory compliance, or public/business interests.	Significance Category 2: Circumstances that reflected degraded safety margins—necessitating prompt management attention along with modified normal operations—to prevent an adverse effect on safe facility operations; worker or	Necessary to support ORPS process.	Specifics are already contained in the Occurrence Reporting Model, Attachment 4.	Changed and moved.		Attach ment 2 – 1.d.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
			public safety and health; regulatory compliance; or public/business interests.					
112.	5.2.e	<u>Significance Category 3.</u> Occurrences in this category are those that are not Operational Emergencies and that have a <i>minor impact</i> on safe facility operations, worker or public safety and health, regulatory compliance, or public/business interests	Significance Category 3: Events or circumstances with localized implications including personnel injury, environmental releases, equipment damage or hazardous circumstances that were locally contained and did not immediately suggest broader systemic concerns.	Necessary to support ORPS process.	Specifics are already contained in the Occurrence Reporting Model, Attachment 4.	Changed and moved.		Attachment 2 – 1.e.
113.	5.2.f	<u>Significance Category 4.</u> Occurrences in this category are those that are not Operational Emergencies and that have <i>some impact</i> on safe facility operations, worker or public safety and health, public/business interests.	Significance Category 3: Events or circumstances with localized implications including personnel injury, environmental releases, equipment damage or hazardous circumstances that were locally contained and did not immediately suggest broader systemic concerns.	Necessary to support ORPS process.	Specifics are already contained in the Occurrence Reporting Model, Attachment 4.	Changed and moved.		Attachment 2 – 1.e.
114.	5.2	If the consequences are not fully determined or the event exceeds the threshold of more than one criterion (see Section 6), then the event must be categorized at the higher criteria level being considered. The occurrence criterion must be continuously reevaluated and changed, as needed, when new information becomes available.	Events or conditions must be initially categorized according to the Reporting Criteria in Attachment 2. The occurrence criterion and/or Significance Category for the incident must be reevaluated and changed as new information becomes available.	Necessary to support ORPS process.	Some changes to reference Attachment 2.	Changed and moved.	Attachment 4	Attachment 4 - 2
115.	5.3	<u>DOE HQ Operations Center Prompt Notifications.</u>	<u>DOE HQ Operations Center Prompt Notifications.</u>		No change.	Retained.		4e
116.	5.3.1	The requirements for the prompt and follow-up notifications to DOE (including NNSA) and other agencies and the appropriate emergency responses to be taken are provided in DOE O 151.1A, <i>Comprehensive Emergency Management System</i> . The specific procedures on how these events are categorized and how and when DOE is notified are included in the site/facility specific emergency response plans or procedures. If an event has been declared an Operational Emergency, the Facility Manager will be responsible for the written	Prompt Notifications, as determined by the Occurrence Reporting Criteria (Attachment 2), must be accomplished in accordance with the Occurrence Reporting Model (Attachment 4).	Necessary to support ORPS process.	Reworded to address all Prompt Notifications together and refer to the appendices that provide the detail.	Changed.	Attachment 2 and 4.	4e

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
		Notification Report and for the completion of all other occurrence reporting requirements, as described below.						
117.	5.3.2	<u>Prompt Notifications for Significance Category 1, 2, 3, and 4 Reportable Occurrences.</u>	Deleted.	N/A	Specifics are already contained in the Occurrence Reporting Model, Attachment 4.	Deleted.		
118.	5.3.2.a	The Facility Manager must notify the DOE Facility Representative (in a manner determined locally) and the DOE Headquarters Operations Center (DOE HQ OC), as required, of the following reportable occurrences as soon as practical (i.e., promptly), but no later than 2 hours after categorization:	Deleted.	N/A	Specifics are already contained in the Occurrence Reporting Model, Attachment 4.	Deleted.	Attachment 4.	
119.	5.3.2.a.(1)	All Significance Category 1 occurrences require a Prompt Notification to the Facility Representative and DOE HQ OC.	Deleted.	N/A	Specifics are already contained in the Occurrence Reporting Model, Attachment 4.	Deleted.	Attachment 4.	
120.	5.3.2.a.(2)	All Significance Category 2 occurrences require a Prompt Notification to the Facility Representative and, if directed by the Facility Representative, to the DOE HQ OC.	Deleted.	N/A	Specifics are already contained in the Occurrence Reporting Model, Attachment 4.	Deleted.	Attachment 4.	
121.	5.3.2.a.(3)	All Significance Category 3 occurrences require a prompt notification to the Facility Representative.	Deleted.	N/A	Specifics are already contained in the Occurrence Reporting Model, Attachment 4.	Deleted.	Attachment 4.	
122.	5.3.2.a.(4)	Additionally, specific Significance Category 2, 3, and 4 occurrences (identified as requiring prompt notification with an asterisk in the reporting criteria listed in Section 6) require prompt notification to the Facility Representative and DOE HQ OC.	Deleted.	N/A	Specifics are already contained in the Occurrence Reporting Model, Attachment 4.	Deleted.	Attachment 2 and 4.	
123.	5.3.2.b	The DOE HQ OC will relay notifications to the appropriate HQ-level Program Manager and make any further notifications, as required.	Deleted.	N/A	Covered by Responsibility 5c(2).		Order 5c(2).	

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
124.	5.3.2.c	The Facility Manager may use the local Field/Site Emergency Operations Center to expedite establishing the communication link required and to record and archive conversations. The prompt notification process is as follows:	The local Field/Site Emergency Operations Center may be used to expedite establishing the communication link required and to record and archive conversations.	Information.	Some verbiage change.	Changed and moved.		Attach ment 4 – 3.a.
125.	5.3.2.c.(1)	The Facility Manager must e-mail the prompt notification of the reportable occurrence to the DOE HQ OC, and follow up with a phone call to the DOE HQ OC to ensure receipt of the e-mail.	The prompt notification must be e-mailed to the DOE HQ OC and receipt must be confirmed.	Necessary to support ORPS process.	Correct as written.	Retained and moved.		Attach ment 4 – 3.b.1).
126.	5.3.2.c.(2)	The Prompt Notification must clearly state/select the Significance Category (1, R, 2, 3, or 4) and identify the specific reporting criteria associated with the occurrence.	Deleted.	This information is included in the next requirement.		Deleted.		
127.	5.3.2.c.(3)	Prompt Notification to the DOE HQ OC must include information on the following items:	The Prompt Notification must include information on the following items, as applicable:	Preamble.	Changed to add “as applicable,” since not everything included in the list will apply in every case.	Changed and moved.		Attach ment 4 – 3.b.2)
128.	5.3.2.c.(3)a	Occurrence Significance Category	Occurrence Significance Category	Necessary to support ORPS process.	Remains the same.	Retained and moved.		Attach ment 4 – 3.b.2)
129.	5.3.2.c.(3)b	Location and description of the event	Location and description of the event.	Necessary to support ORPS process.	Remains the same.	Retained and moved.		Attach ment 4 – 3.b.2)
130.	5.3.2.c.(3)c	Date and time of discovery	Date and time of discovery.	Necessary to support ORPS process.	Remains the same.	Retained and moved.		Attach ment 4 – 3.b.2)
131.	5.3.2.c.(3)d	Damage and casualties	Damage and casualties.	Necessary to support ORPS process.	Remains the same.	Retained and moved.		Attach ment 4 – 3.b.2)
132.	5.3.2.c.(3)e	Impact of event on other activities and operations	Impact of event on other activities and operations.	Necessary to support ORPS process.	Remains the same.	Retained and moved.		Attach ment 4 – 3.b.2)
133.	5.3.2.c.(3)f	Protective actions taken or recommended	Protective actions taken or recommended.	Necessary to support ORPS process.	Remains the same.	Retained and moved.		Attach ment 4 – 3.b.2)
134.	5.3.2.c.(3)g	Weather conditions at the scene	Weather conditions at the scene.	Necessary to support ORPS process.	Remains the same.	Retained and moved.		Attach ment 4 – 3.b.2)
135.	5.3.2.c.(3)h	Level of media interest at scene/facility/site.	Level of media interest at scene/facility/site.	Necessary to support ORPS process.	Remains the same.	Retained and moved.		Attach ment 4 – 3.b.2)
136.	5.3.2.c.(3)i	Other notifications made	Other notifications made.	Necessary to support ORPS process.	Remains the same.	Retained and moved.		Attach ment 4 – 3.b.2)

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
137.	5.3.2.c.(4)	All information should be clear and succinct. Avoid jargon. Uncommon or site/facility-specific abbreviations and acronyms should be fully described.	Deleted.	N/A	This is common writing practice and should be followed without a requirement.	Deleted.		
138.	5.3.2.c.(5)	The Facility Manager must follow the appropriate security procedures if the notification to DOE may contain classified or sensitive information.	Deleted.	N/A	The security expectations are stated in 4.b and Attachment 4 – 1.	Deleted.	4.b and Attachment 4 – 1.	
139.	5.3.2.c.(6)	If the occurrence is recategorized, then the occurrence must be reconsidered for prompt notification. If appropriate, the Facility Manager must notify the Facility Representative and the DOE HQ OC as soon as practical, but within the prompt notification time requirements of the new Significance Category for the recategorized occurrence and provide the Occurrence Report number. The DOE HQ OC will make any required internal DOE HQ notifications.	If the occurrence is recategorized, then the occurrence must be reconsidered for prompt notification and, as appropriate, the same prompt notification process stated above must be followed.	Necessary to support ORPS process.	Changed to be stated more simply.	Changed and moved.		Attachment 4 – 3.c.
140.	5.3.2.c.(7)	Follow-up notifications must be made to DOE for any further degradation in the level of safety or impact on the environment, health, or operations of the facility or other worsening conditions subsequent to the previous notification. If a degradation results in upgrading the event to an Operational Emergency, the DOE HQ OC must be notified in accordance with DOE O 151.1A, <i>Comprehensive Emergency Management System</i> .	Follow-up notifications must be made for any further degradation in the level of safety or impact on the environment, health, or operations of the facility or other worsening conditions subsequent to the initial notification.	Necessary to support ORPS process.	Changed to be stated more simply.	Changed and moved.		Attachment 4 – 3.d.
141.	5.4	<u>Written Notification Report</u> . The Facility Manager must prepare the written Notification Report (including all required fields and all other fields for which information is known) as discussed in DOE G 231.1-1, <i>Occurrence Reporting and Performance Analysis Guide</i> , and distribute it per Section 5.6.e. Direct entry into the computerized Occurrence Reporting and Processing System (ORPS) satisfies this requirement.	<u>Written Notification Report</u> . A written Notification Report must be submitted into the computerized Occurrence Reporting and Processing System (ORPS) within the timeframe specified in this Order, or as soon thereafter as reasonably possible.	Necessary to support ORPS process.	Changed to eliminate the reference to the Guide and state the requirements more simply.	Changed and moved.	Previous reference: DOE G 231.1-1	Attachment 4 – 4.
142.	5.4	Any changes in the reporting criteria of the occurrence, which result in a change, either lower or higher, to the Significance Category, must be documented in an Update Report and submitted within the timeframe required for the Notification Report under the new Significance Category. A discussion on the change in categorization must be included in the Description of Occurrence field in the Update Report.	Any changes to the occurrence reporting criteria that result in a change to the Significance Category, either lower or higher, must be documented in an Update Report and submitted within the timeframe required for the Notification Report under the new	Necessary to support ORPS process	Minor verbiage changes.	Changed and moved.		Attachment 4 – 5.a.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
			Significance Category as described in this Order. A discussion of the change in category must be included in the Update Report at the end of the “Description of Occurrence” field.					
143.		New.	<u>Occurrence Report Processing.</u> Occurrence reports must be processed in accordance with the expectations outlined in the Occurrence Report Preparation (Attachment 3) and Occurrence Reporting Model (Attachment 4).	Necessary to support ORPS process.	New lead in paragraph establishing requirement to prepare ORPS reports in accordance with the ORPS model (Attachment 4). This paragraph also points to writing requirements that are common to feds and contractors in Attachment 3.	New.		4.f
144.	5.4.1	<u>Occurrence Report Preparation.</u> In preparing the Notification Report, and subsequently the Final Report, the following writing instructions must be followed:	Occurrence Report Preparation Notification and Final Reports must be written clearly and concisely so the general reader can understand the basic “who, what, when, where, how” of the event; the safety issues involved; and the actions taken. The following instructions apply:	Necessary to support ORPS process.	Language clarified and combined overall writing requirement from 5.4.1 a	Changed and moved.		Attachment 3 header .
145.	5.4.1a	The report should enable the general reader to understand the basic “what, who, when, where, how” of the event, the safety issues involved, and the actions taken.	Merged with paragraph above.		Merged.	Merged and moved.		Attachment 3.
146.	5.4.1b	The Subject/Title and the first paragraph of the Occurrence Description should relay the essential nature of the event (i.e., a summary of the occurrence in newspaper style).	The Subject or Title of Occurrence and the first paragraph of the Description of Occurrence must relay the essential nature of the event (i.e., a summary of the occurrence in newspaper style). Subsequent paragraphs must contain the background or description of the event at a sufficient level of detail for the reader to understand what happened and the resulting consequences and	Necessary to support ORPS process.	Language clarified and combined level of detail requirement from 5.4.1 d	Merged and moved.		Attachment 3 – 1.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
			actions.					
147.	5.4.1c	All information should be clear and succinct. Avoid redundant and unnecessary text, and lengthy “log book” accounts, unless a discussion of the event in chronological order is considered essential to understanding the event.	Notification and Final Reports must be written clearly and concisely so the general reader can understand the basic “who, what, when, where, how” of the event; the safety issues involved; and the actions taken. The following instructions apply:	Necessary to support ORPS process.	Language clarified and combined overall writing requirement from 5.4.1 a	Changed and moved.		Attach ment 3 header .
148.	5.4.1d	Complex and more significant occurrences should warrant a greater level of detail. Significance Category 4 occurrences would likely need only a short paragraph under Occurrence Description. However, all reports should present enough information so that the general reader understands why the event needs to be reported and what the effect is.	The Subject or Title of Occurrence and the first paragraph of the Description of Occurrence must relay the essential nature of the event (i.e., a summary of the occurrence in newspaper style). Subsequent paragraphs must contain the background or description of the event at a sufficient level of detail for the reader to understand what happened and the resulting consequences and actions.	Necessary to support ORPS process.	Combined with detailed writing requirement in Att 3 paragraph 1.	Merged and moved.		Attach ment 3 – 1.
149.		New.	Final Reports must contain the significance, nature, and extent of the event or condition if this information is not already in the Notification Report.	Necessary to support ORPS process.	Requirement added to ensure important information is included in report so that nature of occurrence can be properly understood.			Attach ment 3 - 2.
150.		New.	Final Reports must contain the causes of the event or condition (including the root cause, as required) using the codes provided in the Causal Analysis Tree (Attachment 5).	Necessary to support ORPS process.	Requirement added to ensure the causes are identified from the causal analysis tree and reported.			Attach ment 3 – 3.
151.		New.	Final reports must also include the immediate actions taken (if not already in the Notification Report), the corrective action(s) to be taken and lessons learned as required by the Occurrence Reporting Model	Necessary to support ORPS process.	Requirement added to ensure that immediate corrective actions and lessons learned are reported as required by the ORPS reporting			Attach ment 3 – 4.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
			(Attachment 4).		model.			
152.		New.	Reports on suspect/counterfeit and defective items or material, must provide the manufacturer/supplier/vendor (including a contact, phone number, and website), the model and part numbers, the quantity found, why the item/material is suspect/counterfeit or defective, and how the item/material is being used. Reports must also include the method of detection (i.e., receipt inspection, craft inspection prior to installation, in-service inspection, or failure) and identify any resulting consequences, along with any photos via hyperlink, as appropriate (see 7 below).	Necessary to support ORPS process.	Requirement added to ensure that appropriate information concerning suspect/counterfeit and defective items are captured and reported.			Attachment 3 – 5.
153.	5.4.1e	Avoid jargon and uncommon or site/facility-specific abbreviations and acronyms. If used, acronyms should be initially spelled out.	Deleted.	N/A	This information pertains to how a report is written, involving the mechanics of writing. It does not pertain to what should be reported. This type of report writing guidance is general in nature; some of it can be found in the Occurrence Report Writer’s Guide.	Deleted.		
154.	5.4.1f	Unless necessary to record and explain the event (e.g., suspect/counterfeit items or material), use general descriptions of equipment, procedures, etc., rather than presenting lengthy detailed titles and the numbers and letters assigned to those items.	Deleted.	N/A	This information pertains to how a report is written, involving the mechanics of writing. It does not pertain to what should be reported. This type of report writing guidance is general in	Deleted.		

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
					nature; some of it can be found in the Occurrence Report Writer’s Guide.			
155.	5.4.1g	Quantify the level of contamination, dose, release, and damage (e.g., estimate the acres of wild land burned) when possible, instead of merely stating a reportable limit was exceeded.	Reports must quantify the level of contamination, dose, release, and damage (e.g., estimate the acres of wild land burned) when possible, instead of merely stating a reportable limit was exceeded.	Necessary to support ORPS process.	Language clarified.	Changed and moved.		Attach ment 3 – 6.
156.	5.4.1h	Use active rather than passive voice whenever possible. For example, write, “ <i>the electrician</i> severed the conduit” rather than “the conduit was severed.”	Deleted.	N/A	This information pertains to how a report is written, involving the mechanics of writing. It does not pertain to what should be reported. This type of report writing guidance is general in nature; some of it can be found in the Occurrence Report Writer’s Guide.	Deleted.		
157.	5.4.1i	When appropriate for clarification, photos, sketches, and drawings must be maintained with the occurrence report record. In addition, sites are encouraged but not required to make photos, sketches, and drawings available via a Web page, with the Web page address included as a hyperlink in the ORPS report.	Photos, sketches, and drawings must be maintained with the occurrence report record when appropriate for clarification.	Necessary to support ORPS process.	Language clarified.	Changed and moved.		Attach ment 3-7.
158.	5.4.2	<u>Notification Report Submittal Schedule</u> . The written Notification Report must be submitted according to the following schedule:	<u>Written Notification Report</u> . A written Notification Report must be submitted into the computerized Occurrence Reporting and Processing System (ORPS) within the timeframe specified in the Occurrence Reporting Model (Attachment 4) or as soon thereafter as reasonably possible.	Necessary to support ORPS process.	The ORPS Model is moved to Attachment 4 of the proposed order and the text has been streamlined to point to the model.	Changed and moved.		Attach ment 4 – 4.
159.	5.4.2a	Reports for Operational Emergencies and Significance Category 1 Occurrences. Before the close of the next business day from the time of categorization (not to exceed 80	Deleted.	N/A	This provision is captured in Attachment 4 of the proposed	Deleted.		

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
		hours).			order and therefore does not need to be duplicated here.			
160.	5.4.2b	Reports for Significance Categories R and 2 Occurrences. Before the close of the next business day from the time of categorization.	Deleted.	N/A	This provision is captured in Attachment 4 of the proposed order and therefore does not need to be duplicated here.	Deleted.		
161.	5.4.2c	Reports for Significance Category 3 Occurrences. No later than close of business on the second business day from the time of categorization.	Deleted.	N/A	This provision is captured in Attachment 4 of the proposed order and therefore does not need to be duplicated here.	Deleted.		
162.	5.4.2d	Reports for Significance Category 4 Occurrences. Only a Short Form Report is required by close of business the second business day from the time of categorization.	Deleted.	N/A	This provision is captured in Attachment 4 of the proposed order and therefore does not need to be duplicated here.	Deleted.		
163.	5.5	<u>Occurrence Investigation and Analysis</u> . The following steps describe an acceptable process for submitting Update Reports and conducting the investigation and analysis of a specific occurrence. DOE 5480.19, <i>Conduct Of Operations Requirements For DOE Facilities</i> , and DOE-STD-1045-93, <i>Guide to Good Practices for Notifications and Investigation of Abnormal Events</i> , should be considered when establishing a program for investigation of occurrences. In cases of conflict between DOE 5480.19 or DOE-STD-1045-93 and this Manual, the requirements of this Manual must be followed.	<u>Occurrence Investigation and Analysis</u> . Occurrences must be investigated and analyzed, as described in the Occurrence Reporting Model (Attachments 4) and the Causal Analysis Tree (Attachment 5).	Necessary to support ORPS process.	Removed reference and pointed to the requirements in Attachment 4 and the Causal Analysis Tree in Attachment 5.	Changed.	DOE 5480.19 DOE-STD-1045-93 has been updated to O 422.1.	4g

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
164.	5.5	In general, the investigative process is used to gain an understanding of the occurrence, its causes, and the corrective actions necessary to prevent recurrence or only remedy the problem, based on the significance of the occurrence. If DOE is doing a Type A or B investigation, the Facility Manager is not required to perform an identical investigation. However, the Facility Manager is still required to do the preliminary assembly of information to turn over to the DOE Accident Investigation Board, in accordance with DOE O 225.1A, <i>Accident Investigation</i> .	General. The purpose of occurrence investigation and analysis is to understand and identify the causes (both individual and organizational) that contributed to the occurrence so those deficiencies can be addressed and corrected. Analyzing occurrence reports promotes the values and concepts of a learning organization envisioned in the Integrated Safety Management (ISM) Feedback and Improvement function, including performance monitoring; identifying deviations or questionable conditions; self-assessing; and using quality analysis to improve. In order to achieve the ISM goal, organizations must learn from occurrences and near misses and go beyond surface level causal analysis to understand how the underlying sources of operational vulnerability combined to produce unintended or undesired results. Occurrence analysis must explain how failure(s) emerged from a normally safe and reliable system to provide the understanding required to improve systems and processes and prevent future accidents.	Necessary to support ORPS process.	Expanded on the guidance on how to investigate and analyze occurrences.	Changed and moved.		Attach ment 4 – 8.a.
165.	5.5.a	The Facility Manager should use the graded approach described in the Occurrence Reporting Model (Section 11) when determining the level of effort required for the investigation into the causes of the occurrence.	Graded Approach. Occurrences must be investigated and analyzed using a graded approach in accordance with locally approved quality and issues management procedures. Facility Mangers must consider the significance or potential significance (e.g., Significance	Necessary to support ORPS process.	Expanded on the guidance on how to investigate and analyze occurrences.	Changed and moved.		Attach ment 4 – 8.b.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
			Category) of the event when choosing the scope and tools to use in the investigation. The investigation and analysis methodology(ies) must be included in the report’s “Description of Cause” field.					
166.	5.5.b	All causes must be identified as required in the Occurrence Reporting Model (Section 11) and included in the occurrence report. The cause codes to be used for reporting are provided in the Causal Analysis Tree (Section 11). Guidance on selecting the appropriate cause code is provided in DOE G 231.1-2, <i>Occurrence Reporting Causal Analysis Guide</i> . The Cause Description field should include a brief discussion to clearly link the event to the cause code(s). For those occurrences that require a formal root cause analysis, any of the site approved root cause analysis methodologies are permitted. The methodology used must be included in the Cause Description field of the occurrence report. In addition to determining the causes of the occurrence, any weaknesses in the facility's implementation of the ISM program must be identified and entered in the ISM field, as discussed in DOE G 231.1-1, <i>Occurrence Reporting and Performance Analysis Guide</i> .	Causal Analysis Documentation. Causes must be identified and appropriately documented in accordance with the Causal Analysis Tree (Attachment 5). The “Description of Cause” field must include a brief discussion that clearly links the event to the cause code(s) and resulting corrective actions. In addition, any discussion of the facility's implementation of the ISM program must be identified and entered in the “ISM” field.	Necessary to support ORPS process.	Removed text referring to Guide that was removed from reference list.	Changed and moved.		Attach ment 4 – 8c.
167.	5.5.c	In addition to submitting an Update Report when the Significance Category of the occurrence has been changed (as stated in Section 5.4), the Facility Manager must submit and distribute an Update Report for all occurrences, with the exception of Significance Category 4 occurrences, if there is any significant and new information about the occurrence. The status of the investigation, recurring consequences, and the identification of additional component defects are activities associated with the occurrence and must be included in Update Reports.	An Update Report must be submitted for all occurrences, with the exception of Significance Category 4 occurrences, if there is any significant and new information about the occurrence. The status of occurrence inquiries, recurring consequences, and the identification of additional component defects must be included in the update.	Necessary to support ORPS process.	Changed the section referenced.	Changed		Attach ment 4 – 5.b.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
168.	5.5.d	Using a graded approach as described in the Occurrence Reporting Model (see Section 11), the Facility Manager should consult in a timely manner with the Facility Representative and the Program Manager, as appropriate, for their assessment, if any, of the occurrence.	Deleted.	N/A	Redundant with job expectations.	Deleted.		
169.	5.6.	<u>Occurrence Report Closure.</u> The following steps describe an acceptable process for closing out the Final Report for all occurrences except those categorized as Significance Category 4:	<u>Report Closure.</u>	Necessary to support ORPS process.	Preliminary paragraph was deleted.	Changed and moved.		Attach ment 4 – 7.
170.	5.6.a	The Final Report must be prepared by the Facility Manager and submitted as soon as practical but within 45 calendar days after initial categorization of the occurrence. The Final Report must be prepared using the writing instructions listed in Section 5.4.1 and must document the following:	<u>Final Reports</u> The Final Report must be prepared and submitted as soon as practical but within 45 calendar days after initial categorization of the occurrence The Final Report must be prepared using the writing instructions provided in Occurrence Report Preparation (Attachment 3).	Necessary to support ORPS process.	Minor word changes.	Changed and moved.		Attach ment 4 – 6.
171.	5.6.a.1	The significance, nature, and extent of the event or condition;	Deleted.	N/A	The requirements are contained in the Occurrence Reporting Model, Attachment 4, of the proposed Order and also in Occurrence Report Preparation (Attachment 3)		Attac hmen ts 3 and 4.	
172.	5.6.a.2	The causes of the event or condition (including the root cause, as required) using the codes provided in the Causal Analysis Tree (Section 11);	Deleted.	N/A	The requirements are contained in the Occurrence Reporting Model, Attachment 4, of the proposed Order and also in Occurrence Report Preparation (Attachment 3)		Attac hmen ts 3 and 4.	
173.	5.6.a.3	The immediate actions taken and the corrective action(s) to be taken (see Section 5.6.f), as required by the Occurrence Reporting Model (Section 11); and	Deleted.	N/A	The requirements are contained in the Occurrence Reporting Model, Attachment		Attac hmen ts 3 and 4.	

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
					4, of the proposed Order and also in Occurrence Report Preparation (Attachment 3)			
174.	5.6.a.4	The lessons learned.	Deleted.	N/A	The requirements are contained in the Occurrence Reporting Model, Attachment 4, of the proposed Order and also in Occurrence Report Preparation (Attachment 3)		Attachments 3 and 4.	
175.	5.6.b	If the required analysis cannot be completed within 45 calendar days after initial categorization, an Update Report must be submitted within the 45 days. The Update Report must provide a detailed explanation of the delay and provide an estimated date for submittal of the Final Report. This information must be reported in the “Evaluation” block of the Occurrence Report. It is expected that the analysis of most occurrences will be completed and the Final Report submitted within the 45 calendar days. However, for certain occurrences, such as those requiring an accident investigation, it is understood that the information required for the Final Report may not be available within this time. For occurrences resulting in an accident investigation, all causes (direct, contributing, and root) identified in the accident investigation report, as well as the corrective actions developed in response to the judgments of need, must be included in the Final Report.	If the required analysis (see paragraph 8, this attachment) cannot be completed within 45 calendar days after initial categorization, an Update Report must be submitted within the 45 days. The Update Report must provide a detailed explanation of the delay in the “Further Evaluation is Required” field of the Occurrence Report and provide an estimated date for submittal of the Final Report For occurrences resulting in the appointment of a Federal Accident Investigation Board (see DOE O 225.1B, <i>Accident Investigation</i>), all causes (direct, contributing, and root) identified in the accident investigation report, as well as the corrective actions developed in response to the judgments of need, must be included in the Final Report.	Necessary to support ORPS process.	Changed to correct and make clearer.	Changed and moved.		Attachment 4 – 5.c and 7.a.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
176.	5.6.c	For Operational Emergencies and Significance Category 1, R, and 2 Final Reports, the Facility Representative must review, approve, and add any comments, as necessary, within 14 calendar days after receipt of the report. For Operational Emergencies and Significance Category 1 Final Reports, after the Facility Representative has approved the occurrence report, the Program Manager must review, approve, and add any comments to the Final Report within 14 calendar days. If the ORPS database is being used, the Facility Representative and Program Manager’s comments should be provided through ORPS. Facility Representative and Program Manager comments are not required for their approval of the report.	Within 14 calendar days after receipt of the report, the Facility Representative must review, approve or reject, and add comments, as necessary for Operational Emergencies and Significance Category 1, R, and 2 Final Reports. Local implementing procedures may specify additional approval requirements beyond those stated in this Order.	Necessary to support ORPS process.	Rewritten for clarification.	Changed and moved.		Attach ment 4 – 7.b.
177.	5.6.d	If the Final Report is not approved by the Facility Representative or the Program Manager, the Facility Representative or Program Manager who is rejecting the report must provide the reason for disapproval in the comment section of the report at the time the action is taken. The revised Final Report must be resubmitted within 21 calendar days of the disapproval. If it cannot be resubmitted within this time, an Update Report must be submitted within the 21 calendar days explaining the delay and providing an estimated date for resubmittal of the Final Report. This information must be reported in the “Evaluation” block of the Occurrence Report.	If the Final Report is not approved by the rejecting Facility Representative or the Program Manager, the Facility Representative or Program Manager must provide the reason for disapproval in the report’s “Facility Representative/Program Manager Comment” field when the action is taken. The revised Final Report must be resubmitted within 21 calendar days of the disapproval. If it cannot be resubmitted within this time, an Update Report must be submitted explaining the delay and providing an estimated date for resubmittal. This information must be reported in the “Further Evaluation is Required” field of the Occurrence Report.	Necessary to support ORPS process.	Minor word changes.	Changed and moved.		Attach ment 4 – 7.d.
178.	5.6.e	All Occurrence Reports must be distributed as soon as practical to the following:	Deleted.	N/A	The ORPS program provides the necessary distribution automatically .	Deleted.		
179.		- Facility Representative	Deleted.	N/A	The ORPS program provides the necessary distribution automatically .	Deleted.		

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
180.		- Program Manager	Deleted.	N/A	The ORPS program provides the necessary distribution automatically .	Deleted.		
181.		- Heads of all Field organizations (including NNSA)	Deleted.	N/A	The ORPS program provides the necessary distribution automatically .	Deleted.		
182.		- Office of Environment, Safety and Health (Office of Performance Assessment and Analysis) and Administrator (NNSA) and	Deleted.	N/A	The ORPS program provides the necessary distribution automatically .	Deleted.		
183.		- DOE Management and Operations or Integrating contractors	Deleted.	N/A	The ORPS program provides the necessary distribution automatically .	Deleted.		
184.	5.6.f	As prescribed on the Occurrence Reporting Model (Section 11) and depending on the Significance Category, the Facility Manager must track all corrective actions to closure, including independent verification or sampling at the facility level and also evaluate the effectiveness of the corrective actions to prevent recurrence (if applicable). Site/contractor corrective action programs must include management of Significance Category 4 occurrences, whose corrective actions are not managed through ORPS.	Deleted.	N/A	This is redundant to other verbiage. O 226.1A and O 414.1C also require corrective action management already.	Deleted.	O 226.1A and O 414.1C	
185.	5.6.g	The cognizant Facility Manager may use the ORPS database to track the status of Final Report corrective actions. For those facilities that do not choose to use ORPS to track the status of their corrective actions, the specific corrective action tracking number from the local corrective action tracking system must be entered into ORPS.	Corrective Action Documentation. Corrective actions status must be tracked in a locally approved tracking system or in the ORPS database. Facilities that use locally approved systems must document the corrective action tracking number from the local tracking system and the expected corrective action completion date in ORPS and update as necessary.	Necessary to support ORPS process.	O 226.1A and O 414.1C require corrective action management already. Since contractors are required to have corrective action management systems outside of ORPS, this change in wording allows for minimizing redundancy by allowing use of one or the other. In the interest of increasing	Changed and moved.	36 CFR Chapter 12, Subchapter B - Records Management.	Attachment 4 – 8.d.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
					contractor accountability, and streamlining requirements to improve efficiencies the contractors should not only be allowed, but expected to use local systems and held accountable for that.			
186.	5.6.g	Any changes made to the corrective actions tracked in the local corrective action system must follow the site's approved change process and should be updated in ORPS. For Significance Category 2 and higher reports, any text change to a corrective action previously entered in ORPS must be updated in ORPS with Facility Representative approval.	Any expected completion date changes must follow the site's approved change process and must be updated in ORPS. For Significance Category 2 and higher reports, any text change to a corrective action previously entered in ORPS must be updated in ORPS with Facility Representative approval.	Necessary to support ORPS process.	Small word changes.	Changed and moved.	Section 5.8	Attachment 4 – 8.c.
187.	5.6g	A status report of all incomplete Occurrence Reports (not Final) and incomplete corrective actions (for those sites who choose to track the status of their corrective actions using ORPS) will be available at any time from the ORPS database.	Deleted.	N/A	This is nice to know info but it doesn't provide any requirements or directions	Deleted.		
188.	5.6g	Retain all supporting information pertaining to each occurrence or report (e.g., graphs, analyses, and formal investigation reports) in accordance with Departmental Records Disposition Schedules, as required by 36 CFR Chapter 12, Subchapter B, RECORDS MANAGEMENT.	Deleted.	N/A	This is already a requirement contained in federal law which every contract requires compliance with	Deleted.		
189.	5.7	<u>Short Form Reports.</u> A Short Form Report, as described in DOE G 231.1-1, <i>Occurrence Reporting and Performance Analysis Guide</i> , must be prepared and submitted for all Significance Category 4 occurrences no later than 2 business days after categorization of the occurrence. This report will satisfy all of the	<u>Deleted.</u>	N/A	Redundant with description of graded approach and the Occurrence Reporting Model.	Deleted.		

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
		written reporting requirements for these occurrences.						
190.	5.8	<u>Performance Analysis and Identification of Recurring Occurrences.</u> Each contractor at a site and managers at DOE owned and operated sites must perform ongoing, but as minimum quarterly, analyses of events during a 12-month period to look for trends. This periodic performance analysis must evaluate occurrences of all significance categories plus contractor-/operator-determined non-reportable events in order to prevent serious events from occurring. Quarterly performance analysis results must be reported to contractor and DOE line management in order to achieve improvements.	<u>Identification of Recurring Occurrences.</u> Periodic reviews to identify potential recurring occurrences must be accomplished in accordance with the Occurrence Reporting Model (Attachment 4). Ongoing analyses, considering all reportable and non-reportable occurrences and events, must be performed to determine if there are recurring occurrences. At a minimum, these analyses should be performed quarterly and should consider at least the previous 12-months. Quarterly analysis results must be reported to line management.	Part of ISM and QA feedback and improvement process function.	Introductory words to reference Attachment 4 that has the requirement.	Changed.		4.h and Attachment 4 - 10.a.
191.	5.8	Occurrences identified as recurring require a new occurrence report to be submitted for notification of the recurring issue, with investigation, root cause analysis, and corrective actions subsequently required. Previous individual Occurrence Report Numbers associated with the recurring issue must be provided in the Similar Occurrence Report Numbers field. The reporting organization should select the appropriate reporting criteria associated with the recurring issue. If no specific reporting criteria can be identified, the Reporting Criteria should be listed as Group 10, Criteria #2.	Deleted.	N/A	Text was too descriptive on how to do it.	Deleted.		
192.	5.8	Recurring occurrences must be categorized and reported collectively as a Significance Category R occurrence, even if each individual occurrence had been originally categorized at a higher or lower significance level (e.g., as Significance Category 1 or 4 or even as non-	Recurring occurrences and events must be categorized and reported collectively as a Significance Category R occurrence no matter what the previous	Necessary to support ORPS process.	Some changes were made and the reference to the Guide was removed.	Changed and moved.		Attachment 4 – 9.b.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
		reportable occurrences). See the Occurrence Reporting Model (Section 11) to learn the requirements for a Significance Category “R” occurrence. More information on the performance analysis process for all occurrence reports and specifics on recurring occurrences are provided in DOE G 231.1-1, <i>Occurrence Reporting and Performance Analysis Guide</i> .	individual categorizations were, even if they were previously non-reportable. Previous individual Occurrence Report Numbers associated with the recurring issue must be provided in the “Similar Occurrence Report Number” field. Significance Category R reports must include the results of subsequent analyses and corrective actions, as described in paragraph 7 of this attachment.					
193.	5.8	DOE Headquarters’ Office of Environment, Safety and Health must perform a semiannual analysis of all reportable occurrences during a 12-month period to look for trends. In those cases where recurring events are discovered, these events must promptly and formally be brought to the attention of the Program Office(s) for identification of appropriate corrective actions.	Deleted.	N/A	Deleted because the referenced office routinely performs subject specific studies and analysis that may differ from the specific study described in this requirement. In addition, the capability is being added to the Internet for all interested parties to be able to perform this complex-wide analysis for themselves.	Deleted.		
194.	5.9	<u>Training</u> . Specific training programs for the requirements of this Manual must be established for both DOE (including NNSA) and contractor personnel for facilities under their cognizance. These training programs must include the following:	Deleted.	N/A	This is redundant with the precepts of ISM and O 414.1C. Training, knowledge, and skills are concepts that managers are already required to do to ensure that the responsible people are properly prepared to meet the expectations set forth in the	Deleted.		

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
					requirements.			
195.	5.9(a)	Indoctrination in the objectives and process of occurrence reporting as defined in the occurrence reporting requirements documents.	Deleted.	N/A	This is redundant with the precepts of ISM and O 414.1C. Training, knowledge, and skills are concepts that managers are already required to do to ensure that the responsible people are properly prepared to meet the expectations set forth in the requirements.	Deleted.		
196.	5.9(b)	Identification of reportable occurrences and their categorization, notification, and associated reporting requirements; analysis, determination, and coding of causes; identification of generic implications; and management of corrective actions.	Deleted.	N/A	This is redundant with the precepts of ISM and O 414.1C. Training, knowledge, and skills are concepts that managers are already required to do to ensure that the responsible people are properly prepared to meet the expectations set forth in the requirements.	Deleted.		
197.	5.9(c)	Utilization of ORPS, including input of occurrence reports and obtaining information from the database.	Deleted.	N/A	This is redundant with the precepts of ISM and O 414.1C. Training, knowledge, and skills are concepts that managers are	Deleted.		

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
					already required to do to ensure that the responsible people are properly prepared to meet the expectations set forth in the requirements.			
198.	5.9(d)	Utilization of the Causal Analysis Tree.	Deleted.	N/A	This is redundant with the precepts of ISM and O 414.1C. Training, knowledge, and skills are concepts that managers are already required to do to ensure that the responsible people are properly prepared to meet the expectations set forth in the requirements.	Deleted.		
199.	5.9(e)	Where applicable, the preparation of occurrence reports that may include classified information or unclassified controlled information (e.g., OUO or UCNI), including the sanitization of the report for entry into ORPS.	Deleted.	N/A	This is redundant with the precepts of ISM and O 414.1C. Training, knowledge, and skills are concepts that managers are already required to do to ensure that the responsible people are properly prepared to meet the expectations set forth in the requirements.	Deleted.		
200.	6.2.1	An event can meet multiple reporting criteria that establish it as an occurrence. All of the specific reporting criteria applicable for an occurrence must be identified. Some criteria are “secondary” in that they complement other reporting criteria that require occurrence reporting. In these cases, all of the applicable criteria must be recorded. Each criterion is denoted by its Group, Subgroup	All of the specific reporting criteria applicable for an occurrence must be identified. Some criteria are “secondary” in that they complement other reporting criteria that require occurrence reporting. In these cases, all of the applicable criteria	Necessary to support ORPS process.	All relevant information is needed for complete records.	Moved.		Attach ment 2, paragr aph 2e

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
		(if applicable), and sequence number (#). Thus, for example, the violation of a safety limit is denoted as Group 3, Subgroup A, Sequence (1) or “3A(1).”	must be recorded and the event categorized as the higher SC reporting criterion being considered.					
201.	6.2.2	The reporting criteria presented below list a specific Significance Category (SC) for each criterion, between the sequence number (#) and the criterion text. Significance Categories are designated as “OE” for Operational Emergencies, “R” for recurring occurrences, or 1, 2, 3, or 4. Thus, for example, the Significance Category for a Stop Work Order issued by a DOE office, criterion 4B(1), is SC 2.	The reporting criteria presented below list a specific Significance Category (SC) for each criterion, between the sequence number (#) and the criterion text. Significance Categories are designated as “OE” for Operational Emergencies, “R” for recurring occurrences, or 1, 2, 3, or 4. Thus, for example, the Significance Category for a Stop Work Order issued by a DOE office, criterion 4B(1), is SC 2.	Explanation.		Retained and moved.		Attachment 2, paragraph 2b
202.	6.2.3	Operational Emergencies, Significance Category 1, and some other occurrences in lesser significance categories require prompt notification to the DOE HQ OC. Asterisks (*) next to the significance categories below denote those occurrences requiring prompt notification to the DOE HQ OC. Section 5.3.2 of this Manual defines the prompt notification requirements.	Operational Emergencies, Significance Category 1, and some other occurrences in lesser significance categories require prompt notification to the DOE HQ OC. Asterisks (*) next to the significance categories below denote those occurrences requiring prompt notification to the DOE HQ OC. Attachment 4 contains the prompt notification requirements.	Necessary to support ORPS process.	Need to know prompt notification requirements.	Retained and moved.	Section 5.3.2	Attachment 2, paragraph 2c
203.	6.2.4	DOE O 151.1A describes initiating events that are considered Operational Emergencies. DOE O 225.1A defines when Type A or B accident investigations should be initiated. While some Operational Emergencies and some other ORPS occurrences involve conditions that would be sufficient to initiate accident investigations, criterion 10(1) herein will report the actual initiation of Type A or B accident investigations.	DOE O 151.1C describes initiating events that are considered Operational Emergencies. DOE O 225.1B defines when Federal Accident Investigations Board must be initiated. While some Operational Emergencies and some other ORPS occurrences involve conditions that would be sufficient to initiate accident investigations, criterion 10(1) herein will report the actual initiation of a Federal Accident	Necessary to support ORPS process.	Explains the relationship with DOE O 151.1 and 225.1B.	Retained and moved.	DOE O 151.1C	Attachment 2, paragraph 2d

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
			Investigation Board.					
204.	6.3	<u>Occurrence Reporting Criteria</u>	<u>Occurrence Reporting Criteria</u>					Attach ment 2.
205.	6.3	Group 1 - Operational Emergencies	Group 1 - Operational Emergencies			Retained and moved.	DOE 151.1 A, Chapt er 5, Parag raph 2	Attach ment 2.
206.	Group 1	# SC Criterion	# SC Criterion					Attach ment .2
207.		(1) *OE An Operational Emergency not needing further classification, as defined in DOE 151.1A, Chapter 5, Paragraph 2.	(1) *OE An Operational Emergency not needing further classification, as defined in DOE 151.1A, Chapter 5, Paragraph 2.	Per ref.		Retained and moved.	DOE 151.1 A, Chapt er 5, Parag raph 2	Attach ment 2.
208.		(2) *OE An Alert, as defined in DOE 151.1A, Chapter 5, Paragraph 3a.	(2) *OE An Alert, as defined in DOE 151.1A, Chapter 5, Paragraph 3a.	Per ref.		Retained and moved.	DOE 151.1 A, Chapt er 5, Parag raph 3a	Attach ment 2.
209.		(3) *OE A Site Area Emergency, as defined in DOE 151.1A, Chapter 5, Paragraph 3b.	(3) *OE A Site Area Emergency, as defined in DOE 151.1A, Chapter 5, Paragraph 3b.	Per ref.		Retained and moved.	DOE 151.1 A, Chapt er 5, Parag raph 3b	Attach ment 2.
210.		(4) *OE A General Emergency, as defined in DOE 151.1A, Chapter 5, Paragraph 3c.	(4) *OE A General Emergency, as defined in DOE 151.1A, Chapter 5, Paragraph 3c.	Per ref.		Retained and moved.	DOE 151.1 A, Chapt er 5, Parag raph 3c	Attach ment 2.
211.	6.3.	Group 2 - Personnel Safety and Health	Group 2 - Personnel Safety and Health				29 CFR Part 1904.7	Attach ment 2.
212.	Group 2	<u>Subgroup A Occupational Illnesses/Injuries</u>	<u>Subgroup A Occupational Illnesses/Injuries</u>				29 CFR Part 1910	Attach ment 2.
213.	Group 2	# SC Criterion	# SC Criterion					Attach ment 2.
214.	Group 2	(1) *1 Any occurrence due to DOE operations resulting in a fatality or terminal injury/illness. For fatalities caused by overexposures, the intent of this criterion is to report those caused by acute rather than chronic effects.	(1) *1 Any occurrence due to DOE operations resulting in a fatality or terminal injury/illness. Report fatalities or terminal injuries/illnesses caused by overexposures under Subgroup B, Occupational Exposures.	ISM policy.	Chronic affects are too difficult to consistently capture. Precursors are captured elsewhere.	Changed and moved.		Attach ment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
215.	Group 2	(2) *1 Any single occurrence requiring in-patient hospitalization of three or more personnel.	(2) *1 Any single occurrence requiring in-patient hospitalization of three or more personnel.	ISM policy.	Serious injuries given immediate notification and thorough investigation	Moved.	29 CFR 1904	Attach ment 2.
216.	Group 2	New	(3) 2 Any single occurrence resulting in an occupational injury that requires in-patient hospitalization for 5 days or more, commencing within 7 days from the date the injury was received. Note: This criterion is similar to one of the thresholds for initiating a Federal Accident Investigation Board. If such an investigation is begun, the event should be reported under Criterion 10(1), as well as under this criterion if the injury so warrants.	ISM policy.	Tracks criteria that might result in Federal Investigations, whether or not they actually result in an investigation.	Added.	DOE O 225.1 B	Attach ment 2.
217.	Group 2	(3) 2 Any single occurrence resulting in three or more personnel having Days Away, Restricted or Transferred (DART) cases per 29 CFR Part 1904.7.	(4) 2 Any single occurrence resulting in three or more personnel having Days Away, Restricted or Transferred (DART) cases per 29 CFR § 1904.7.	ISM policy.	Serious injuries given immediate notification and thorough investigation	Moved.	29 CFR 1904	Attach ment 2.
218.	Group 2	(4) *2 Personnel exposure to chemical, biological or physical hazards above limits established by the Occupational Safety and Health Administration (refer to 29 CFR Part 1910) or American Conference of Governmental Industrial Hygienists, whichever is lower, and that requires the administration of medical treatment beyond simple first aid on the same day as the exposure. [29 CFR 1904.7(b)(5)(i) and (ii) define “medical treatment” and “first aid.”]	Deleted from this Subgroup.	ISM policy.	Need to capture known exposures to provide feedback for safety and health programs. Higher level exposures tracked separately.	Moved to Group 2, Subgroup B.	29 CFR 1910	Attach ment 2.
219.	Group 2	(5) 3 Personnel exposure to chemical, biological or physical hazards above limits established by the Occupational Safety and Health Administration (refer to 29 CFR Part 1910) or American Conference of Governmental Industrial Hygienists.	Deleted from this Subgroup.	ISM policy.	Need to capture known exposures to provide feedback for safety and health programs.	Moved to Group 2, Subgroup B.	29 CFR 1910	Attach ment 2.
220.	Group 2	(6) 3 Any single occurrence resulting in a serious occupational injury. A serious occupational injury is an occupational injury that:	(5) 3 Any single occurrence resulting in a serious occupational injury. A serious occupational injury is an occupational injury that:	ISM policy.	Highlights more serious injuries and requires a level of investigation and corrective	Moved.	DOE P 450. X	Attach ment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
					actions that may not be present in the CAIRS system.			
221.	Group 2	(a) Requires hospitalization for more than 48 hours, commencing within 7 days from the date the injury was received;	(a) Requires in-patient hospitalization for more than 48 hours, commencing within 7 days from the date the injury was received;	ISM policy.	Highlights more serious injuries and requires a level of investigation and corrective actions that may not be present in the CAIRS system.	Minor change and moved.	DOE P 450. X	Attach ment 2.
222.	Group 2	(b) Results in a fracture of any bone (except simple fractures of fingers, toes, or nose, or a minor chipped tooth);	(b) Results in a fracture of any bone (except simple fractures of fingers, toes, or nose, or a minor chipped tooth);	ISM policy.	Highlights more serious injuries and requires a level of investigation and corrective actions that may not be present in the CAIRS system.	Moved.	DOE P 450. X	Attach ment 2.
223.	Group 2	(c) Causes severe hemorrhages or severe damage to nerves, muscles, or tendons;	(c) Causes severe hemorrhages or severe damage to nerves, muscles, or tendons. (Note: Severe damage to nerves, muscles, or tendons is generally considered to have occurred if surgery is required to correct the damage.)	ISM policy.	Highlights more serious injuries and requires a level of investigation and corrective actions that may not be present in the CAIRS system.	Moved.	DOE P 450. X	Attach ment 2.
224.	Group 2	(d) Damages any internal organ; or	(d) Damages any internal organ;	ISM policy.	Highlights more serious injuries and requires a level of investigation and corrective actions that may not be present in the CAIRS system.	Moved.	DOE P 450. X	Attach ment 2.
225.	Group 2	New	(e) Causes (1) a concussion or (2) loss of consciousness due to an impact to the head, or	ISM policy.	Other injuries that should be captured.	New	DOE P 450. X	Attach ment 2.
226.	Group 2	(e) Causes second- or third-degree burns, affecting more than five percent of the body surface.	(f) Causes second- or third-degree burns, affecting more than five percent of the body surface.	ISM policy.	Highlights more serious injuries and requires a level of investigation and corrective actions that may not be present in the	Moved.	DOE P 450. X	Attach ment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
					CAIRS system.			
227.	6.3	Group 2 - Personnel Safety and Health	Group 2 - Personnel Safety and Health					Attach ment 2.
228.	Group 2	New.	<u>Subgroup B Occupational Exposure.</u>		Created to separate occupational injuries from occupational exposures.	Added.		Attach ment 2.
229.	Group 2	New.	(1) *1 Any acute exposure from a chemical, biological, or physical hazard due to DOE operations resulting in a fatality or terminal injury/illness or requiring in-patient hospitalization of three or more personnel.	ISM policy.	Need to capture known exposures to provide feedback for safety and health programs. Higher level exposures tracked separately.	Added.		Attach ment 2.
230.	Group 2	New.	(2) 2 Any acute exposure resulting in an occupational injury that requires in-patient hospitalization for 5 days or more, commencing within 7 days from the date the exposure was received or any exposure event resulting in three or more personnel having Days Away, Restricted or Transferred (DART) cases per 29 CFR § 1904.7.	ISM policy.	Need to capture known exposures to provide feedback for safety and health programs. Higher level exposures tracked separately.	Added.		Attach ment 2.
231.	Group 2	New.	(3) *2 Personnel exposure to chemical, biological or physical hazards that exceeds 10 times the limits established in 10 CFR 851, Worker Safety and Health Program (see 10 CFR 851.23 Safety and Health Standards).	ISM policy.	Need to capture known exposures to provide feedback for safety and health programs. Higher level exposures tracked separately.	Added.		Attach ment 2.
232.	Group 2	New.	(4) *2 Personnel exposure to chemical, biological or physical hazards (e.g. electrical energy above 50 volts, constant loud noise, laser or ultraviolet light, heat, etc.) above limits established in 10 CFR 851, Worker Safety and Health Program (see 10 CFR 851.23 Safety and	ISM policy.	Need to capture known exposures to provide feedback for safety and health programs. Higher level exposures tracked separately.	Moved from Group 2, Subgroup A, #4, and changed slightly..		Attach ment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
			Health Standards), but below levels deemed immediately dangerous to life and health (IDLH), and requires the administration of medical treatment beyond simple first aid on the same day as the exposure.					
233.	Group 2	New.	(5) 3 Any exposure including chronic resulting in a serious occupational injury. A serious occupational injury is an occupational injury that: (a) Requires in-patient hospitalization for more than 48 hours, commencing within 7 days from the date the exposure was received; (b) Damages any internal organ; (c) Leads to diagnosis of a debilitating disease such as Chronic Beryllium Disease; or (d) Causes second- or third-degree burns, affecting more than five percent of the body surface.	ISM policy.	Need to capture known exposures to provide feedback for safety and health programs. Higher level exposures tracked separately.	Added.		Attach ment 2.
234.	Group 2	New.	(6) 4 Personnel exposure to chemical, biological or physical hazards (e.g. electrical energy above 50 volts, constant loud noise, laser or ultraviolet light, heat, etc.) above limits established in 10 CFR 851, but below levels deemed immediately dangerous to life and health (IDLH).	ISM policy.	Need to capture known exposures to provide feedback for safety and health programs. Higher level exposures tracked separately.	Moved from Group 2, Subgroup A, #5, and changed slightly..		Attach ment 2.
235.	6.3	Group 2 - Personnel Safety and Health	Group 2 - Personnel Safety and Health					Attach ment 2.
236.	Group 2	Subgroup B Fires/Explosions	Subgroup C Fires/Explosions				DOE O 420.1 B	Attach ment 2.
237.	Group 2	# SC Criterion	# SC Criterion					Attach ment 2.
238.	Group 2	(1) *1 Any unplanned fire or explosion within primary confinement/containment boundaries for nuclear or hazardous material within a facility.	(1) *1 Any unplanned fire within primary confinement/containment boundaries of a nuclear facility, except a small fire that self-extinguishes in 10 minutes or less.	Nuclear Safety policy.	Significant threat to containment.	Changed slightly and moved.		Attach ment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
239.	Group 2	[Note: Facility specific documents need to define what constitutes the primary confinement/containment boundary.]	[Note: Facility specific documents need to define what constitutes the primary confinement/containment boundary.]	Information.	Note.	Moved.		Attach ment 2.
240.	Group 2	(2) *2 Any unplanned fire or explosion in a nuclear facility that activates a fire suppression system (e.g., halon discharge, sprinkler heads activating), is extinguished by a fire department, or disrupts normal facility operations.	(2) *2 Any unplanned fire or explosion in a nuclear facility that: a) Activates a fixed fire suppression system (e.g., halon or sprinkler heads), or b) Is extinguished manually using fire protection equipment, or c) Disrupts normal operations in the facility, or d) Is a small fire within primary confinement/containment that self-extinguishes in 10 minutes or less.	Nuclear Safety policy.	Threat to containment.	Changed slightly and moved.		Attach ment 2.
241.	Group 2	[Note: The activation or degradation of Safety Class and Safety Significant fire suppression systems are addressed by Group 4 Criteria.]	[Note: The activation or degradation of Safety Class and Safety Significant fire suppression systems are addressed by Group 4 Criteria.]	Information.	Note.	Moved.		Attach ment 2.
242.	Group 2	(3) *3 Any unplanned fire or explosion in a non-nuclear facility that	(3) *3 Any unplanned fire or explosion in a non-nuclear facility that	Preamble.				Attach ment 2.
243.	Group 2	a) Activates a fire suppression system,	a) Activates a fire suppression system, or	See ref.	Important information for fire protection program.	Moved.	DOE O 420.1 B	Attach ment 2.
244.	Group 2	b) Takes longer than 10 minutes to extinguish following the arrival of fire protection personnel, or	b) Takes longer than 10 minutes to extinguish following the arrival of fire protection personnel, or	See ref.	Important information for fire protection program.	Moved.	DOE O 420.1 B	Attach ment 2.
245.	Group 2	c) Disrupts normal operations in a high hazard facility.	c) Disrupts normal operations in the facility for more than eight hours.	See ref.	Important information for fire protection program.	Changed and moved.	DOE O 420.1 B	Attach ment 2.
246.		(4) *4 Any wild land fire (e.g., forest fire, grassland fire) or other fire outside of a DOE facility that has the potential to threaten the facility.	(4) *4 Any wild land fire (e.g., forest fire, grassland fire) or other fire outside of a DOE facility that has the potential to threaten the facility.	See ref.	Important information for fire protection program.	Moved.	DOE O 420.1 B	Attach ment 2.
247.	6.3.	Group 2 - Personnel Safety and Health	Group 2 - Personnel Safety and Health					Attach ment 2.
248.	Group 2	New.	<u>Subgroup D - Explosions</u>					Attach ment 2.
249.	Group 2	New.	(1) *1 Any unplanned explosion within primary confinement/contain	See ref.	Separates explosions from fires for better	New.	DOE O 420.1 B	Attach ment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
			ment boundaries of a nuclear facility. [Note: Facility specific documents need to define what constitutes the primary confinement/containment boundary.]		trending information.			
250.	Group 2	New.	(2) *2 Any unplanned explosion in a nuclear facility that disrupts normal operations in the facility.	See ref.	Separates explosions from fires for better trending information.	New.	DOE O 420.1 B	Attach ment 2.
251.	Group 2	New.	(3) *3 Any unplanned explosion in a non-nuclear facility that disrupts normal operations in the facility.	See ref.	Separates explosions from fires for better trending information.	New.	DOE O 420.1 B	Attach ment 2.
252.	6.3.	Group 2 - Personnel Safety and Health	Group 2 - Personnel Safety and Health					Attach ment 2.
253.	Group 2	<u>Subgroup C Hazardous Energy Control</u>	<u>Subgroup E Hazardous Electrical Energy Control.</u>				29 CFR 1910	Attach ment 2.
254.	Group 2	# SC Criterion	# SC Criterion					Attach ment 2.
255.	Group 2	New	Note: Failure to establish an electrically safe work condition (e.g., lockout/tagout) resulting in the discovery of an incomplete isolation of hazardous electrical energy is considered an exposure. This <u>does not include</u> discoveries made by zero-energy checks before work is authorized or administrative errors.	Clarification.	Puts the following electrical criteria in context.	New		Attach ment 2.
256.	Group 2	New.	(1) 2 Exposure to a hazardous electrical energy source with a High Electrical Severity (ES) Score ($ES \geq 1750$), as defined in the DOE/EFCOG Electrical Severity Measurement Tool at http://www.efcog.org/wg/esh_es/docs/Electrical_Severity_Measurement_Tool.pdf .	Part of DOE’s electrical safety program.	DOE electrical safety community uses the Severity tool to help determine which events are most noteworthy to share and trend.	New.	29 CFR 1910	Attach ment 2.
257.	Group 2	New.	(2) 3 Exposure to a hazardous electrical energy source with a Medium Electrical Severity (ES) Score ($30 < ES < 1750$), as defined in the DOE/EFCOG Electrical Severity Measurement Tool.	Part of DOE’s electrical safety program.	DOE electrical safety community uses the Severity tool to help determine which events are most	New.	29 CFR 1910	Attach ment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
					noteworthy to share and trend.			
258.	Group 2	New.	(3) 4 Any failure to follow a prescribed hazardous energy control process (e.g., lockout/tagout) not resulting in discovery of an uncontrolled hazardous energy source. This category includes administrative errors.	Part of DOE’s electrical safety program.	DOE electrical safety community uses the Severity tool to help determine which events are most noteworthy to share and trend.	New.	29 CFR 1910	Attach ment 2.
259.	Group 2	New.	If the electrical severity score cannot be determined for initial categorization or reporting, the Electrical Hazard Factor (EHF), as defined in the DOE/EFCOG Electrical Severity Measurement Tool, can be used for initial categorization as follows:	Preamble.		New.		Attach ment 2.
260.	Group 2	New.	(4) 2 Very-High (EHF = 100) and High (EHF = 50) Electrical Hazard Factor.	Part of electrical safety program.	Uses key factor in ESI to drive actions.	New.	29 CFR 1910	Attach ment 2.
261.	Group 2	New.	(5) 3 Moderate (EHF = 10) Electrical Hazard Factor.	Part of electrical safety program.	Uses key factor in ESI to drive actions.	New.	29 CFR 1910	Attach ment 2.
262.	Group 2	New.	If initial categorization is determined using the Electrical Hazard Factor (EHF), the event must be re-categorized as a #(1) or # (2) using the Electrical Severity (ES) Scoring as soon as it has been completed, but prior to submitting the Final Report.	Necessary for trending.	Allows for initial categorization to help determine appropriate actions per ORPS Model.	New.		Attach ment 2.
263.	6.3.	Group 2 - Personnel Safety and Health	Group 2 - Personnel Safety and Health					Attach ment 2.
264.	Group 2	New.	<u>Sub Group F - Hazardous Energy Control (Other than electrical).</u>		Separates electrical and other energy hazards for better trending.	New.	29 CFR 1910	Attach ment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
265.	Group 2	New.	(1) 2 Any unexpected or unintended personal contact (burn, injury, etc.) with a hazardous energy source (e.g., powered mechanical hazards, steam, pressurized gas).	See ref.	Separates electrical and other energy hazards for better trending.	New.	29 CFR 1910	Attach ment 2.
266.	Group 2	New.	(2) 3 Any unexpected discovery of an uncontrolled hazardous energy source (e.g., powered mechanical hazards, steam, pressurized gas, etc.). This criterion does not include discoveries made by zero-energy checks and other precautionary investigations made before work is authorized to begin.	See ref.	Separates electrical and other energy hazards for better trending.	New.	29 CFR 1910	Attach ment 2.
267.		(1) 2 Failure to follow a prescribed hazardous energy control process (e.g., lockout/tagout) or disturbance of a previously unknown or mislocated hazardous energy source (e.g., live electrical power circuit, steam line, pressurized gas) resulting in a person contacting (burn, shock, etc.) hazardous energy.	Deleted.	N/A	Replaced by other criteria.	Deleted.		
268.	Group 2	(2) 3 Failure to follow a prescribed hazardous energy control process (e.g., lockout/tagout) or a site condition that results in the unexpected discovery of an uncontrolled hazardous energy source (e.g., live electrical power circuit, steam line, pressurized gas). This criterion does not include discoveries made by zero-energy checks and other precautionary investigations made before work is authorized to begin.	(3) 4 Any failure to follow a prescribed hazardous energy control process (e.g., lockout/tagout) not resulting in discovery of an uncontrolled hazardous energy source. This category includes administrative errors.	See ref.	Important information to determine performance. Simplified in the new set of criteria.	Moved.	29 CFR 1910	Attach ment 2.
269.	6.3	Group 3 - Nuclear Safety Basis	Group 3 - Nuclear Safety Basis				10 CFR 830.3	Attach ment 2.
270.	Group 3	<u>Subgroup A Technical Safety Requirement Violations</u>	<u>Subgroup A Technical Safety Requirement and Other Hazard Control Violations (excluding nuclear criticality).</u>				10 CFR 830.2 04	Attach ment 2.
271.	Group 3	# SC Criterion	# SC Criterion					Attach ment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
272.	Group 3	New.	[Note: Report nuclear criticality events under Group 3, Subgroup C below]	Clarification		Added.		Attach ment 2.
273.	Group 3	(1) *1 Any violation of a Hazard Category 1, 2, or 3 nuclear facility’s Technical Safety Requirement (or Operational Safety Requirement) Safety Limit.	(1) *1 Any violation of a Hazard Category 1, 2, or 3 nuclear facility’s Technical Safety Requirement (or Operational Safety Requirement) Safety Limit.	See ref.	Important information to track performance of high risk facilities.	Moved.	10 CFR 830.2 04	Attach ment 2.
274.	Group 3	[Note: Safety Limits are high-level Technical Safety Requirement controls, used infrequently across the DOE Complex. As defined in 10 CFR 830.3, a Safety Limit is a limit on process variables associated with those safety class physical barriers, generally passive, that are necessary for the intended facility function and that are required to guard against the uncontrolled release of radioactive materials.]	[Note: Safety Limits are high-level Technical Safety Requirement controls, used infrequently across the DOE Complex. As defined in 10 CFR § 830.3, a Safety Limit is a limit on process variables associated with those safety class physical barriers, generally passive, that are necessary for the intended facility function and that are required to guard against the uncontrolled release of radioactive materials.]	Information.	Note.	Moved.		Attach ment 2.
275.	Group 3	(2) 2 Any violation or noncompliance of a Hazard Category 1, 2, or 3 nuclear facility’s Technical Safety Requirement (or Operational Safety Requirement) Limiting Control Setting, Limiting Condition for Operation, Administrative Control, or Surveillance Requirement.	(2) 2 Any violation or noncompliance of a Hazard Category 1, 2, or 3 nuclear facility’s Technical Safety Requirement (or Operational Safety Requirement) Limiting Control Setting, Limiting Condition for Operation, Administrative Control, or Surveillance	See ref.	Important information to track performance of high risk facilities.	Moved.	10 CFR 830.2 04	Attach ment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
			Requirement.					
276.	Group 3	Exception: An event consisting solely of a surveillance test performed after the prescribed surveillance period, and in which the equipment was found to be capable of performing its specified safety function. (See separate criterion for late surveillance tests below.)	Exception: An event consisting solely of a surveillance test (to include any periodic activity explicitly captured in the DSA that is used to ensure operability or viability of a structure, system, or component) performed after the prescribed surveillance period, and in which the Structure, system, or component was found to be capable of performing its specified safety function. (See separate criterion for late surveillance tests below.)	Continues above.	Amplification.	Changed slightly and moved.		Attachment 2.
277.	Group 3	(3) 3 Any violation or noncompliance of a hazard control specified in a Hazard Category 1, 2, or 3 nuclear facility’s DOE approved Documented Safety Analysis [issued pursuant to 10 CFR 830.204 and including Basis for Interim Operation (BIO), etc.], or DOE issued Safety Evaluation Report that are not addressed by Criteria 3A(1) and 3A(2).	(3) 3 Any violation or noncompliance of a hazard control specified in a Hazard Category 1, 2, or 3 nuclear facility’s DOE approved Documented Safety Analysis [issued pursuant to 10 CFR § 830.204 and including Basis for Interim Operation (BIO), etc.], or DOE issued Safety Evaluation Report that are not addressed by Criteria 3A(1) and 3A(2).	See ref.	Important information to track performance of high risk facilities.	Moved.	10 CFR 830.204	Attachment 2.
278.	Group 3	Exceptions:	Exceptions:					Attachment 2.
279.	Group 3	(a) An event consisting solely of a violation of a safety management program (e.g., quality assurance, personnel training) cited in the Documented Safety Analysis.	(a) An event consisting solely of a violation of a safety management program (e.g., quality assurance, personnel training) cited in the Documented Safety Analysis.	Modifies criteria.	Lower significance.	Moved.		Attachment 2.
280.	Group 3	(b) An event consisting solely of a surveillance test performed after the prescribed surveillance period, and in which the equipment was found to be capable of performing its specified safety function. (See separate criterion for late surveillance tests below.)	(b) An event consisting solely of a surveillance test (to include any periodic activity explicitly captured in the DSA that is used to ensure operability or viability of a structure, system, or component) performed after the prescribed surveillance period, and in which the structure, system, or component was	Modifies criteria.	Captured at a lower level of significance.	Changed and moved.		Attachment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
			found to be capable of performing its specified safety function. (See separate criterion for late surveillance tests below.)					
281.	Group 3	(4) 4 An event consisting solely of a surveillance test performed after the prescribed surveillance period, and in which the equipment was found to be capable of performing its specified safety function.	(4) 3 An event consisting solely of a surveillance test (to include any periodic activity explicitly captured in the DSA that is used to ensure operability or viability of a structure, system, or component) performed after the prescribed surveillance period, and in which the structure, system, or component was found to be capable of performing its specified safety function.	See ref.	Captures low level, but important events for trending.	Changed and moved.	10 CFR 830.204	Attachment 2.
282.	6.3.	Group 3 - Nuclear Safety Basis	Group 3 - Nuclear Safety Basis					Attachment 2.
283.	Group 3	Subgroup B Documented Safety Analysis Inadequacies	Subgroup B Documented Safety Analysis Inadequacies				10 CFR 830.203(g)	Attachment 2.
284.	Group 3	# SC Criterion	# SC Criterion					Attachment 2.
285.	Group 3	(1) 2 Determination of a positive Unreviewed Safety Question (USQ) that reveals a currently existing inadequacy in the documented safety analysis [e.g., Safety Analysis Report (SAR) or Basis for Interim Operation (BIO)].	(1) 2 Determination of a positive Unreviewed Safety Question (USQ) that reveals a currently existing inadequacy in the documented safety analysis [e.g., Safety Analysis Report (SAR) or Basis for Interim Operation (BIO)].	See ref.	Documents for trending.	Moved.	10 CFR 830.203(g)	Attachment 2.
286.	Group 3	(2) 3 Declaration of a potential inadequacy of the documented safety analysis (a potential positive USQ), per 10 CFR 830.203(g).	(2) 3 Declaration of a potential inadequacy of the documented safety analysis (a potential positive USQ), per 10 CFR 830.203(g).	See ref.	Informational documentation for trending.	Moved.	10 CFR 830.203(g)	Attachment 2.
287.	Group 3	New.	[Note: When a potential inadequacy of a documented safety analysis is found, it would be initially reported under Criterion 3B(2). If further analysis results in a positive USQ determination, then the occurrence report should be updated to recategorize it under	Information.	Note.	Moved.		Attachment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
			Criterion 3B(1). If the analysis results in a negative USQ determination, the occurrence report should be cancelled.]					
288.	6.3.	Group 3 - Nuclear Safety Basis	Group 3 - Nuclear Safety Basis					Attach ment 2.
289.	Group 3	<u>Subgroup C Nuclear Criticality Safety</u>	<u>Subgroup C Nuclear Criticality Safety Control Violations</u>				10 CFR 830, DOE O 420.1 B	Attach ment 2.
290.	Group 3	# SC Criterion	# SC Criterion					Attach ment 2.
291.	Group 3	New.	(1) *OE A criticality accident occurs.	Nuclear Safety policy.	Tracks a criticality event separately from loss of controls.	New.	DOE Nuclear Safety Policy	Attach ment 2.
292.	Group 3	(1) *1 A loss of multiple nuclear criticality process-condition controls, where processes include operation, transport, and storage of fissionable materials, such that no valid controls are available to prevent a criticality accident.	(2) *1 A condition in which no valid controls are available to prevent a criticality accident. An accident has not occurred, but only due to other, non-credited, barriers or controls.	See ref.	Documents significant Nuclear Safety near miss.	Changed and moved.	10 CFR 830, DOE O 420.1 B	Attach ment 2.
293.	Group 3	(2) 2 A loss of one or more nuclear criticality process-condition controls such that an accidental criticality is possible from the loss of an additional process-condition control, where processes include operation, transport, and storage of fissionable materials.	(3) 2 A loss of one or more nuclear criticality barriers such that an accidental criticality is possible from the loss of an additional barrier.	See ref.	Documents degradation in Nuclear Safety controls.	Changed and moved.	10 CFR 830, DOE O 420.1 B	Attach ment 2.
294.	Group 3	New.	(4) 3 Any event consisting solely of a nuclear criticality surveillance test performed after the prescribed surveillance period, and in which the equipment was found to be capable of performing its specified safety function.	Criticality safety.	Captures surveillance issues associated with criticality safety.	New.	DOE O 420.1 B	Attach ment 2.
295.	Group 3	New.	(5) 3 A deficiency in criticality safety analysis such that the required safety margin is not established with the credited control set.	Criticality safety.	Captures deficiencies in the safety margin.	New.	DOE O 420.1 B	Attach ment 2.
296.	Group 3	New.	(6) 3 Degradation of a credited criticality control (or controls) such that the safety margin is reduced or (for operations based	Criticality safety.	Captures deficiencies in the safety margin.	New.	DOE O 420.1 B	Attach ment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
			on non-credibility) loss of credited controls that reduces the safety margin.					
297.	6.3.	Group 4 - Facility Status	Group 4 - Facility Status					Attach ment 2.
298.	Group 4	[Note: The criteria below apply to both nuclear and non-nuclear facilities, where applicable.]	[Note: The criteria below apply to both nuclear and non-nuclear facilities. However, criteria specific to Safety Class or Safety Significant Structures, Systems, or Components would apply only to nuclear facilities.]	Qualifier.	Clarifies applicability.	Changed and moved.		Attach ment 2.
299.	Group 4	Subgroup A Safety Structure/System/Component Degradation	Subgroup A Safety Structure/System/Component Degradation.				DOE O 420.1 B	Attach ment 2.
300.		New.	[Note: Performance degradation includes the absence or incomplete installation of Design Features for which credit has been taken in the Documented Safety Analysis.]	Information.	Note.	Added.	DOE O 420.1 B	Attach ment 2.
301.	Group 4	# SC Criterion	# SC Criterion					
302.	Group 4	(1) 3 Performance degradation of any Safety Class or Safety Significant Structure, System, or Component (SSC) that prevents satisfactory performance of its design function when it is required to be operable.	(1) 3 Performance degradation of any Safety Class (SC) or Safety Significant (SS) Structure, System, or Component (SSC) that prevents satisfactory performance of its design function when it is required to be operable or any support system that is required for safety operation of the SC or SS SSCs.	See ref.	Documents degradation in Nuclear Safety controls.	Changed and moved.	DOE O 420.1 B	Attach ment 2.
303.	Group 4	(2) 4 Performance degradation of any Safety Class SSC when not required to be operable.	(2) 4 Performance degradation of any Safety Class SSC when not required to be operable.	See ref.	Documents degradation in Nuclear Safety controls.	Moved.	DOE O 420.1 B	Attach ment 2.
304.	6.3	Group 4 - Facility Status	Group 4 - Facility Status					Attach ment 2.
305.	Group 4	Subgroup B - Operations	Subgroup B - Operations				DOE O 420.1 B	Attach ment 2.
306.	Group 4	# SC Criterion	# SC Criterion					Attach ment 2.
307.	Group 4	(1) *2 A Stop Work Order issued by a DOE office.	(1) *2 A formal change of operational mode or curtailment of work or processes) directed by a DOE Field Element Manager or Contracting Officer	Significant event affecting operations.	Clarifies and captures events that required intervention to stop work.	Changed and moved.		Attach ment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
			for safety reasons (e.g., a Stop Work Order).					
308.	Group 4	(2) 2 Actuation of a Safety Class Structure, System, or Component (SSC), or its alarms, resulting from an actual unsafe condition. Spurious alarms (e.g., due to electronic noise, radon/thoron decay) should not be reported.	(2) 2 Actuation of a Safety Class Structure, System, or Component (SSC), or its alarms. Spurious alarms (e.g., due to electronic noise, radon/thoron decay) should not be reported.	See ref.	Documents potential failures in SSC systems.	Changed and moved.	DOE O 420.1 B	Attach ment 2.
309.	Group 4	(3) 3 Actuation of a Safety Significant Structure, System, or Component (SSC), or its alarms, resulting from an actual unsafe condition. Spurious alarms (e.g., due to electronic noise, radon/thoron decay) should not be reported.	(3) 3 Actuation of a Safety Significant Structure, System, or Component (SSC), or its alarms. Spurious alarms (e.g., due to electronic noise, radon/thoron decay) should not be reported.	See ref.	Documents unsafe conditions with SSC systems.	Changed and moved.	DOE O 420.1 B	Attach ment 2.
310.	Group 4	(4) 3 Any facility evacuation, not including a precautionary evacuation, in response to an actual event. If the event fell under another reporting criterion, then evacuation should be reported as well by noting multiple reporting criteria for the single occurrence.	(4) 3 A facility evacuation, other than a precautionary evacuation or an evacuation due to false alarms or spurious alarms (e.g., due to electronic noise, radon/thoron decay). If the event fell under another reporting criterion, then evacuation should be reported as well by noting multiple reporting criteria for the single occurrence.	Captures unusual activities.	Important to document evacuations to capture abnormal conditions.	Changed and moved.		Attach ment 2.
311.	Group 4	(5) 4 A facility operational event caused by deviating from a written procedure or using an inadequate procedure resulting in an adverse effect on safety, such as: an inadvertent facility or operations shutdown (i.e., a change of operational mode or curtailment of work or processes), facility or operations shutdown due to alarm response procedures, inadvertent process liquid transfer, or inadvertent release of hazardous material from its engineered containment.	(5) 3 A facility operational event caused by deviating from a written procedure or by using an inadequate procedure, and which resulted in an adverse effect on safety, such as, but not limited to: a) an inadvertent facility or operations shutdown (i.e., a change of operational mode or curtailment of work or processes), b) a manual facility or operations shutdown due to alarm response procedures, c) an inadvertent process liquid transfer, or d) an inadvertent release of hazardous material from its engineered containment.	Captures unusual activities.	Captures a certain class of abnormal event highlighting inadequate procedures. Conduct of operations.	Changed and moved.		Attach ment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
312.	Group 4	(6) *4 A facility or operations shutdown (i.e., a change of operational mode or curtailment of work or processes) directed by management for safety reasons.	(6) *3 A temporary stop of a work activity directed by contractor line management for safety reasons and for which approval from contractor line management will be required to resume work.	Captures unusual activities.	Documents work interruptions.	Changed and moved.		Attach ment 2.
313.	Group 4	New.	(7) *3 A temporary stop of a work activity directed by a DOE employee (other than a Field Element Manager or Contracting Officer) for safety reasons	Captures unusual activities.	Documents work interruptions.	New.		Attach ment 2.
314.	Group 4	(7) 4 A facility or site stand-down resulting from safety reasons reportable as an occurrence or occurrences.	(8) 4 A facility or site stand-down resulting from safety reasons reportable as an occurrence or occurrences.	Captures unusual activities.	Documents work interruptions.	Moved.		Attach ment 2.
315.	Group 4	[Note: This is a secondary reporting criterion and does not require a separate occurrence report.]	[Note: This is a secondary reporting criterion and does not require a separate occurrence report.]	Information.	Clarifies criteria above.	Moved.		Attach ment 2.
316.	Group 4	(8) 4 Any event or condition that would prevent immediate facility or offsite emergency response capabilities.	(9) 4 Any event or condition that would prevent immediate facility or offsite emergency response capabilities.	Captures potential safety situation.	Documents situations where emergency response is potentially compromised .	Moved.		Attach ment 2.
317.	6.3	Group 4 - Facility Status	Group 4 - Facility Status					Attach ment 2.
318.	Group 4	Subgroup C - Suspect/Counterfeit and Defective Items or Material	Subgroup C - Suspect/Counterfeit and Defective Items or Material				DOE O 414.1 C	Attach ment 2.
319.		# SC Criterion	# SC Criterion					
320.	Group 4	New.	[Note: Include the detailed information identified in Attachment 3.]	Information.	Note.	Added.	DOE O 414.1 C and DOE O 420.1 B	Attach ment 2.
321.	Group 4	(1) 3 Discovery of any suspect/counterfeit item or material found in a Safety Class or Safety Significant Structure, System, or Component (SSC). A suspect item or material is one whose documentation, appearance, performance, material, or other characteristics may have been misrepresented by the vendor, supplier, distributor, or manufacturer. A counterfeit item or material is one for which sufficient evidence exists that deliberate misrepresentation has occurred.	(1) 3 Discovery of any suspect/counterfeit item or material found in a Safety Class or Safety Significant Structure, System, or Component (SSC). A suspect item or material is one whose documentation, appearance, performance, material, or other characteristics may have been misrepresented by	See refs.	No change.	Moved.	DOE O 414.1 C and DOE O 420.1 B	Attach ment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
			the vendor, supplier, distributor, or manufacturer. A counterfeit item or material is one for which sufficient evidence exists that deliberate misrepresentation has occurred.					
322.	Group 4	(2) 4 Discovery of any suspect/counterfeit item or material other than office supplies, office equipment, or household products.	(2) 4 Discovery of any other suspect or counterfeit item or material (i.e., not found in a Safety Class or Safety Significant Structure, System, or Component) that is found in any application whose failure could result in a loss of safety function, or present a hazard to public or worker health and safety.	See ref.	Clarifies the S/CI to capture.	Changed and moved.	DOE O 414.1 C	Attach ment 2.
323.	Group 4	(3) 4 Discovery of any defective item or material, other than a suspect/counterfeit item or material, in any application whose failure could result in a loss of safety function, or present a hazard to public or worker health and safety. A defective item or material is any item or material that does not meet the commercial standard or procurement requirements as defined by catalogues, proposals, procurement specifications, design specifications, testing requirements, contracts, or the like. It does not include parts or services that fail or are otherwise found to be inadequate because of random failures or errors within the accepted reliability level.	(3) 4 Discovery of any defective item or material, other than a suspect/counterfeit item or material, in any application whose failure could result in a loss of safety function, or present a hazard to public or worker health and safety. A defective item or material is any item or material that does not meet the commercial standard or procurement requirements as defined by catalogues, proposals, procurement specifications, design specifications, testing requirements, contracts, or the like. It does not include parts or services that fail or are otherwise found to be inadequate because of random failures or errors within the accepted reliability level.	Catches defective items. See ref.	Clarifies which defective items to capture.	Moved.	DOE O 414.1 C	Attach ment 2.
324.	6.3.	Group 5 – Environmental	Group 5 – Environmental					Attach ment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
325.	Group 5	<u>Subgroup A - Releases</u>	<u>Subgroup A - Releases</u>			Moved.	40 CFR 302 or 40 CFR 355	Attach ment 2.
326.	Group 5	# SC Criterion	# SC Criterion					Attach ment 2.
327.	Group 5	(1) *2 Any release (onsite or offsite) of a hazardous substance, material, waste, or radionuclide from a DOE facility, that is above permitted levels and exceeds the reportable quantities specified in 40 CFR 302 or 40 CFR 355.	(1) *3 Any release (onsite or offsite) of a hazardous or extremely hazardous substance, including radionuclides from a DOE facility in a quantity equal to or exceeding the federal reportable quantities specified (See specifications in 40 CFR Part 302, Designation, Reportable Quantities, and Notification, and 40 CFR Part 355, Emergency Planning and Notification.) Any discharge of oil from a DOE facility in such quantities as “may be harmful” pursuant to the Clean Water Act, section 311 (b) (4), as specified in 40 CFR Part 110.	See refs.	Significant environmental insults must be documented and investigated.	Changed and moved.	40 CFR 302 40 CFR 355 40 CFR 110	Attach ment 2.
328.	Group 5	New.	(2) 3 Any release (onsite or offsite) of a hazardous substance, material, waste, radionuclide, or other pollutant from a DOE facility that is above levels or limits specified by outside agencies in a permit, license, or equivalent authorization. Any discharge, emission, or disposition into the environment that must be reported to outside agencies in a format other than routine periodic reports is reportable under this criterion.	Various permits.	Captures violations of various permit agreements.	New.		Attach ment 2.
329.	Group 5	(2) 2 Any discharge that exceeds 100 gallons of oil of any kind or in any form, including, but not limited to, petroleum, fuel oil, sludge, oil refuse, and oil mixed with wastes other than dredged spoil. For operations involving oil field crude or condensate, any discharge of 100 barrels or more is reportable under this criterion.	(3) 4 Any release (onsite or offsite) that exceeds 100 gallons of oil of any kind or in any form, including, but not limited to, petroleum, fuel oil, sludge, oil refuse, and oil mixed with wastes other than dredged spoil. For operations involving oil field crude or condensate,	Captures oil releases to the environment for various laws and regulations.	Changed significance level. Significant oil spills need to be documented and investigated.	Changed and moved.	DOE O 450.1 A	Attach ment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
			any discharge that must be reported to outside agencies in a format other than routine periodic reports is reportable under this criterion.					
330.	Group 5	(3) 4 Any release (onsite or offsite) of a hazardous substance, material, waste, or radionuclide from a DOE facility that is above permitted levels and exceeds 50 percent of the reportable quantities specified in 40 CFR 302 or 40 CFR 355.	Deleted.	Deleted.	Captured elsewhere.	Deleted.		Attach ment 2.
331.	Group 5	(4) 4 Any release (onsite or offsite) of a hazardous substance, material, waste, or radionuclide from a DOE facility that must be reported to outside agencies in a format other than routine periodic reports. (However, oil spills of less than 10 gallons and with negligible environmental impact need not be reported in ORPS.)	(4) 4 Any release (onsite or offsite) of a hazardous substance, material, waste, or radionuclide from a DOE facility that must be reported to outside agencies in a format other than routine periodic reports. (However, oil or antifreeze solution spills of less than 10 gallons and with negligible environmental impact need not be reported in ORPS. For operations involving oil field crude or condensate, any discharge not exceeding 100 barrels need not be reported under this criterion.)	See ref.	No change. Onsite releases need to be documented as trending indicators and as information for DOE workforce.	Changed and moved.	DOE O 450.1 A	Attach ment 2.
332.	Group 5	New.	(5) 4 For releases (on site or offsite) of sulfur hexafluoride from a DOE facility in a quantity equal to or exceeding 115 pounds (1,247 metric tons of CO2e according to Table A-1 of 40 CFR Part 98, Subpart A). This could be a onetime release or a cumulative release over the course of a calendar year.	See ref.	Key sustainability event (large CO2e release).	New.	40 CFR Part 98	Attach ment 2.
333.	6.3.	Group 5 – Environmental	Group 5 – Environmental					Attach ment 2.
334.	Group 5	Subgroup B - Ecological and Cultural Resources	Subgroup B - Ecological and Cultural Resources			Moved.		Attach ment 2.
335.	Group 5	# SC Criterion	# SC Criterion					Attach ment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
336.	Group 5	(1) 2 Any occurrence causing significant impact to any ecological resource for which DOE is a trustee (e.g., destruction of a critical habitat, damage to an historic/archeological site, damage to wetlands).	(1) 2 Any occurrence including releases causing significant impact to ecological or cultural resource for which DOE is a trustee For example, extensive damage to, or destruction of: a) Ecologically preserved areas, or pristine or protected wetlands; b) Threatened or protected flora or fauna or critical habitats; c) Potable drinking water intake or well usage; or d) Historical/archeological sites.	EMS.	Captures events that threaten protected habitats.	Moved.		Attach ment 2.
337.	Group 5	New.	(2) *2 Any occurrence, including releases, resulting in extensive environmental degradation (e.g., fish kill, notable loss or relocation of native species, need for interdiction of crop sales, and restriction to human access).	EMS.	Documents and provides a response to environmental insults.	New.		Attach ment 2.
338.	6.3.	Group 6 - Contamination/ Radiation Control	Group 6 - Contamination/ Radiation Control				DOE O 5400.5	Attach ment 2.
339.	Group 6	<u>Subgroup A - Loss of Control of Radioactive Materials</u>	<u>Subgroup A - Loss of Control of Radioactive Materials</u>				10 CFR Part 835, Appendix E	Attach ment 2.
340.	Group 6	# SC Criterion	# SC Criterion					Attach ment 2.
341.	Group 6	New	[Note: The criteria in Subgroup 6A do not apply to surface radioactive contamination on property. Surface radioactive contamination is addressed by the criteria in Subgroup 6B.]	Information.	Note.	Added.		Attach ment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
342.	Group 6	(1) 2 Identification of radioactive material offsite due to DOE operations/activities that exceeds applicable DOE-approved authorized limits (pursuant to DOE O 5400.5). This applies to items/areas consisting of radioactive material. This does not apply to items with surface radioactive contamination. See Criterion 6B(1) below for criteria for identification of items with surface radioactive contamination.	Deleted because it was duplicative with 6.B.(1)..			Deleted.		
343.	Group 6	(2) 2 Loss of radioactive material that exceeds 100 times the quantities specified in 10 CFR Part 835, Appendix E (excluding consumer products such as smoke detectors), or loss of accountability of such material for more than 24 hours. The 24-hour time period begins when the loss of accountability is discovered.	(1) 2 Loss of radioactive material that exceeds 100 times the quantities specified in 10 CFR Part 835, Appendix E (excluding consumer products such as smoke detectors, if they are handled in accordance with manufacturer’s instructions), or loss of accountability of such material for more than 24 hours. The 24-hour time period begins when the loss of accountability is discovered.	See ref.	Documents events that could pose a hazard to the public.	Changed and moved.	10 CFR 835	Attach ment 2.
344.	Group 6	(3) 3 Loss of radioactive material which exceeds 1 times and no greater than 100 times the quantities specified in 10 CFR Part 835, Appendix E (excluding consumer products such as smoke detectors) or loss of accountability of such material for more than 24 hours. The 24-hour time period begins when the loss of accountability is discovered.	(2) 3 Loss of radioactive material which exceeds 1 times and no greater than 100 times the quantities specified in 10 CFR Part 835, Appendix E (excluding consumer products such as smoke detectors, if they are handled in accordance with manufacturer’s instructions) or loss of accountability of such material for more than 24 hours. The 24-hour time period begins when the loss of accountability is discovered.	See ref.	Documents loss of material.	Changed and moved.	10 CFR Part 835, Appe ndix E	Attach ment 2.
345.	6.3.	Group 6 - Contamination/ Radiation Control	Group 6 - Contamination/ Radiation Control					Attach ment 2.
346.	Group 6	<u>Subgroup B - Spread of Radioactive Contamination</u>	<u>Subgroup B - Spread of Radioactive Contamination</u>				10 CFR Part 835, Appe ndix D DOE O 458.1	Attach ment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
347.	Group 6	# SC Criterion	# SC Criterion					Attach ment 2.
348.	Group 6	(1) 2 Identification of radioactive contamination offsite due to DOE operations/activities that exceeds applicable DOE-approved authorized limits (pursuant to DOE 5400.5) or, if there are none, the values found in 10 CFR Part 835, Appendix D.	(1) 2 Identification of radioactive material or contamination offsite due to DOE operations/activities that exceeds applicable DOE-approved authorized limits (pursuant to DOE O 458.1) or, if there are none, the values found in 10 CFR Part 835, Appendix D.	See refs.	Documents offsite contamination outside of DOE limits.	Changed and moved.	10 CFR Part 835, Appendix D DOE O 458.1	Attach ment 2.
349.	Group 6	[Note: All releases of property containing or potentially containing residual radioactivity are subject to requirements in DOE 5400.5. Compliance with 10 CFR Part 835, Appendix D values does not necessarily satisfy the requirements in DOE 5400.5.]	[Note: Release or clearance of property containing or potentially containing residual radioactive material is subject to requirements in DOE O 458.1. Compliance with 10 CFR Part 835, Appendix D values does not necessarily satisfy the requirements in DOE O 458.1.]	Clarification of above criteria.		Changed and moved.		Attach ment 2.
350.	Group 6	(2) 2 Identification of onsite radioactive contamination greater than 100 times the total contamination values in 10 CFR 835 Appendix D and that is found outside of the following locations: Contamination Areas, High Contamination Areas, Airborne Radioactivity Areas, Radiological Buffer Areas, and areas controlled in accordance with 10 CFR 835.1102(c). For tritium, the reporting threshold is 100 times the removable contamination values in 10 CFR Part 835, Appendix D. [Notes:	(2) 2 Identification of onsite radioactive contamination greater than 100 times the total contamination values in 10 CFR Part 835 Appendix D and that is found outside of the following locations: Contamination Areas, High Contamination Areas, Airborne Radioactivity Areas, Radiological Buffer Areas, areas controlled in accordance with 10 CFR § 835.1102(c), and, per § 835.604(a), any non-posted area that is under the continual observation and control of an individual knowledgeable of and empowered to implement required access and exposure control measures. Footnote 3 to Appendix D of 10 CFR 835 does not apply to this criterion. For tritium, the reporting threshold is 100 times the removable contamination values in 10 CFR Part 835,	See refs.	Documents onsite contamination levels significantly above DOE limits.	Changed and moved.	10 CFR 835 Appendix D	Attach ment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
			Appendix D.. [Notes:					
351.	Group 6	(a) This does not apply to contamination from residual radioactive material meeting applicable DOE-approved authorized limits.	(a) This reporting criterion does not apply to contamination from residual radioactive material meeting applicable DOE-approved authorized limits.	Clarifies above criteria.		Changed and moved.		Attach ment 2.
352.	Group 6	(b) This also does not apply to legacy radioactive contamination, which will be reported under a separate criterion below.	(b) This reporting requirement also does not apply to legacy radioactive contamination, which is to be reported under a separate criterion below.	Clarifies above criteria.		Changed and moved.		Attach ment 2.
353.	Group 6	(c) The exclusion from reporting contamination in a Radiological Buffer Area applies only when the area has been established next to a Contamination Area, High Contamination Area or Airborne Radioactivity Area and its exit requirements have adopted guidance from Article 338.2 of DOE-STD-1098-99.]	(c) The exclusion from reporting contamination in a Radiological Buffer Area applies only when the area has been established next to a Contamination Area, High Contamination Area, or Airborne Radioactivity Area and its exit requirements have adopted guidance from Article 338.2 of DOE-STD-1098-2008.]	Clarifies above criteria.		Changed and moved.		Attach ment 2.
354.	Group 6	(3) 3 Identification of onsite radioactive contamination greater than 10 times the total contamination values in 10 CFR 835 Appendix D and that is found outside of the following locations: Contamination Areas, High Contamination Areas, Airborne Radioactivity Areas, Radiological Buffer Areas, and areas controlled in accordance with 10 CFR 835.1102(c). For tritium, the reporting threshold is 10 times the removable contamination values in 10 CFR Part 835, Appendix D. [Notes:	(3) 3 Identification of onsite radioactive contamination greater than 10 times the total contamination values in 10 CFR Part 835 Appendix D and that is found outside of the following locations: Contamination Areas, High Contamination Areas, Airborne Radioactivity Areas, Radiological Buffer Areas, areas controlled in accordance with 10 CFR § 835.1102(c), and, per § 835.604(a), any non-	See refs.	Companion to previous criteria and captures events of slightly less significance, but still an order of magnitude over DOE limits.	Changed and moved.	10 CFR 835 Appen dix D	Attach ment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
			posted area that is under the continual observation and control of an individual knowledgeable of and empowered to implement required access and exposure control measures. Footnote 3 to Appendix D of 10 CFR 835 does not apply to this criterion. For tritium, the reporting threshold is 10 times the removable contamination values in 10 CFR Part 835, Appendix D.. [Notes:					
355.	Group 6	(a) This does not apply to contamination from residual radioactive material meeting applicable DOE-approved authorized limits.	(a) This does not apply to contamination from residual radioactive material meeting applicable DOE-approved authorized limits.	Clarifies above criteria.		Moved.		Attach ment 2.
356.	Group 6	(b) This also does not apply to legacy radioactive contamination, which will be reported under a separate criterion below.	(b) This also does not apply to legacy radioactive contamination, which will be reported under a separate criterion below.	Clarifies above criteria.		Moved.		Attach ment 2.
357.	Group 6	(c) The exclusion from reporting contamination in a Radiological Buffer Area applies only when the area has been established next to a Contamination Area, High Contamination Area or Airborne Radioactivity Area and its exit requirements have adopted guidance from Article 338.2 of DOE-STD-1098-99.]	(c) The exclusion from reporting contamination in a Radiological Buffer Area applies only when the area has been established next to a Contamination Area, High Contamination Area or Airborne Radioactivity Area and its exit requirements have adopted guidance from Article 338.2 of DOE-STD-1098-2008.]	Clarifies above criteria.		Changed and moved.		Attach ment 2.
358.	Group 6	New.	d) This reporting criterion does not apply to packages monitored in accordance with 10 CFR 835.405 that meet DOT contamination limits specified in 49 § CFR 173.443(a).	Clarifies above criteria.		New.		Attach ment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
359.	Group 6	(4) 4 Identification of onsite legacy radioactive contamination greater than 10 times the total contamination values in 10 CFR 835 Appendix D and that is found outside of the following locations: Contamination Areas, High Contamination Areas, Airborne Radioactivity Areas, Radiological Buffer Areas, and areas controlled in accordance with 10 CFR 835.1102(c). For tritium, the reporting threshold is 10 times the removable contamination values in 10 CFR Part 835, Appendix D. [Notes:	(4) 4 Identification of onsite legacy radioactive contamination greater than 10 times the total contamination values in 10 CFR Part 835 Appendix D, exclusive of Footnote 3 to Appendix D, and that is found outside of the following locations: Contamination Areas, High Contamination Areas, Airborne Radioactivity Areas, Radiological Buffer Areas, and areas controlled in accordance with 10 CFR § 835.1102(c), and, per §835.604(a), any non-posted area that is under the continual observation and control of an individual empowered to implement access and exposure control measures. Footnote 3 to Appendix D of 10 CFR 835 does not apply to this criterion. For tritium, the reporting threshold is 10 times the removable contamination values in 10 CFR Part 835, Appendix D. [Notes:	See ref.	Documents legacy contamination higher than DOE limits which is of interest to the public.	Changed and moved.	10 CFR 835 Appendix D	Attachment 2.
360.	Group 6	(a) Legacy radioactive contamination is radioactive contamination resulting from historical operations that are unrelated to current activities.	(a) Legacy radioactive contamination is radioactive contamination resulting from historical operations that are unrelated to current activities.	Clarifies above criteria.		Moved.		Attachment 2.
361.	Group 6	(b) This does not apply to contamination from residual radioactive material meeting applicable DOE-approved authorized limits.	(b) This does not apply to contamination from residual radioactive material meeting applicable DOE-approved authorized limits.	Clarifies above criteria.		Moved.		Attachment 2.
362.	Group 6	(c) The exclusion from reporting contamination in a Radiological Buffer Area applies only when the area has been established next to a Contamination Area, High Contamination Area or Airborne Radioactivity Area and its exit requirements have adopted guidance from Article 338.2 of DOE-STD-1098-99.]	(c) The exclusion from reporting contamination in a Radiological Buffer Area applies only when the area has been established next to a Contamination Area, High Contamination Area or Airborne Radioactivity Area and its exit	Clarifies above criteria.		Moved.		Attachment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
			requirements have adopted guidance from Article 338.2 of DOE-STD-1098-2008.]					
363.	6.3.	Group 6 - Contamination/ Radiation Control	Group 6 - Contamination/ Radiation Control					Attach ment 2.
364.	Group 6	Subgroup C - Radiation Exposure	Subgroup C - Radiation Exposure				10 CFR 835	Attach ment 2.
365.	Group 6	# SC Criterion	# SC Criterion					Attach ment 2.
366.	Group 6	(1) *1 Determination of a dose that exceeds the limits specified in 10 CFR Part 835, Subpart C, Occupational Radiation Protection or DOE O 5400.5, Chapter II, Item 1 [i.e., 100 mrem Total Effective Dose Equivalent (TEDE) for offsite exposures to a member of the public].	(1) *1 Determination of a dose that exceeds the limits specified in 10 CFR Part 835, Subpart C, Occupational Radiation Protection or DOE O 458.1. The limits in DOE O 458.1 are a Total Effective Dose (TED) exceeding 100 mrem (1mSv) in a year, an equivalent dose to the lens of the eye exceeding 1500 mrem (15 mSv) in a year, or an equivalent dose to the skin or extremities exceeding 5000 mrem (50 mSv) in a year, from all sources of ionizing radiation and exposure pathways that could contribute significantly to the total dose or a 25 mrem (0.25mSv) dose to members of the public from DOE-related exposure sources only excepting: 1) dose from radon and its decay products in air; 2) dose received by patients from medical sources of radiation, and by volunteers in medical research programs; 3) dose from background radiation; and 4) dose from occupational exposure under NRC or Agreement State license or to general employees regulated under 10 CFR Part 835.	See refs.	Public exposures over DOE established limits need to be captured and corrected.	Changed and moved.	10 CFR 835 Subp art C DOE O 458.1	Attach ment 2.
367.	Group 6	(2) 2 Any unmonitored exposure that exceeds the values for providing personnel dosimeters and bioassays as stated in 10 CFR 835.402(a) or 10 CFR 835.402(c).	(2) 2 An exposure estimated to exceed the values for providing personnel dosimeters and bioassays as stated in 10 CFR § 835.402(a)	See refs.	Documents program failures to monitor personnel properly.	Changed and moved.	10 CFR 835	Attach ment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
			or 10 CFR § 835.402(c) and the failure to provide the monitoring addressed by those requirements.					
368.	Group 6	(3) 3 Any single occupational exposure that exceeds an expected exposure or dosimetry result by:	(3) 3 Any single occupational exposure that exceeds an expected exposure or dosimetry result by: (1) 500 mrem Committed Effective Dose (CED), or (2) the greater of 10 percent or 100-mrem effective dose due to external exposure.	See ref.	Documents significant single exposures to workers.	Changed and moved.	10 CFR 835	Attach ment 2.
369.	Group 6	(1) 500 mrem Committed Effective Dose Equivalent (CEDE), or	Deleted.	Incorporated above.		Deleted.		
370.	Group 6	(2) the greater of 10 percent or 100-mrem effective dose equivalent due to external exposure.	Deleted.	Incorporated above.		Deleted.		
371.	Group 6	(4) 3 Determination of an estimated annual dose that exceeds 10 mrem Total Effective Dose Equivalent (TEDE) for offsite exposures to a member of the public from air pathways only.	(4) 3 An annual exposure to members of the public that is estimated to have resulted in, or have the potential to result in: a) a Total Effective Dose (TED) from DOE sources exceeding 10 mrem in a year from airborne releases; or b) exceeding any exposure limit specified in DOE O 458.1 (including, but not limited to Radon-222 flux rates that exceed 20 pCi (0.7Bq) m ⁻² sec ⁻¹ from radium-226 wastes accepted for storage or disposal, and liquid discharges containing radionuclides from DOE activities that exceed (at the point of discharge) either 5pCi (0.2 Bq) per gram above background of settleable solids for alpha-emitting radionuclides or 50 pCi (2Bq) per gram above background of settleable solids for beta-emitting radionuclides).	See ref.	Public exposures need to be documented.	Changed and moved.	DOE O 458.1	Attach ment 2.
372.	6.3.	Group 6 - Contamination/ Radiation Control	Group 6 - Contamination/ Radiation Control					Attach ment 2.
373.	Group 6 Sub D	<u>Subgroup D - Personnel Contamination</u>	<u>Subgroup D - Personnel Contamination</u>				10 CFR Part	Attach ment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
							835, Appendix D	
374.		# SC Criterion	# SC Criterion					Attachment 2.
375.		(1) *2 Any occurrence requiring offsite medical assistance for contaminated personnel, including transporting a person to an offsite medical facility or bringing offsite medical personnel onsite to perform treatment or decontamination.	(1) *2 Any occurrence requiring offsite medical assistance for contaminated personnel, including transporting a person to an offsite medical facility or bringing offsite medical personnel onsite to perform treatment or decontamination.	Noteworthy event concerning personnel contamination.	Documents significant events.	Moved.		Attachment 2.
376.		(2) 2 Identification of personnel or clothing contamination offsite due to DOE operations that exceeds the values for total contamination found in 10 CFR Part 835, Appendix D. For tritium use the values for removable contamination found in 10 CFR Part 835, Appendix D.	(2) 2 Identification of personnel or clothing contamination offsite due to DOE operations that exceeds the values for total contamination found in 10 CFR Part 835, Appendix D. For tritium use the values for removable contamination found in 10 CFR Part 835, Appendix D.	See ref.	Documents significant offsite personnel contamination.	Moved.	10 CFR 835	Attachment 2.
377.		(3) 4 Any onsite contamination of personnel or clothing (excluding site provided protective clothing) that exceeds 10 times the values for total contamination identified in 10 CFR Part 835, Appendix D. The contamination level must be based on direct measurement and not averaged over any area. This criterion does not apply to tritium contamination.	(3) 3 Any onsite contamination of personnel or clothing (excluding clothing provided by the site for radiological protection) that exceeds 10 times the values for total contamination identified in 10 CFR Part 835, Appendix D. The contamination level must be based on direct measurement and not averaged over any area. This criterion does not apply to tritium contamination.	See ref.	Documents noteworthy personnel contamination events.	Changed and moved.	10 CFR 835	Attachment 2.
378.	6.3.	Group 7 - Nuclear Explosive Safety	Group 7 - Nuclear Explosive Safety				DOE O 420.1 B DOE O 452.2 D	Attachment 2.
379.	Group 7	# SC Criterion	# SC Criterion					Attachment 2.
380.	Group 7	(1) *1 Damage to a nuclear explosive that results in a credible threat to nuclear explosive safety.	(1) *1 Damage to a nuclear explosive that results in a credible threat to nuclear explosive	See refs.	Significant Nuclear Explosives Safety event.	Moved.	DOE O 420.1 B	Attachment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
			safety.				DOE O 452.2 D	
381.	Group 7	New.	(2) 2 A near miss event during nuclear explosive operations where the potential for significant consequences was substantially increased, such as: a) unauthorized introduction of electrical, mechanical, chemical, thermal, or electromagnetic energy into a nuclear explosive, b) unauthorized compromise of a nuclear explosive safety feature when installed on a nuclear explosive, c) inadvertent substitution of a nuclear explosive for a nuclear explosive-like assembly (NELA) or vice versa, d) violation of a nuclear explosive safety rule (NESR), or e) conclusion by an Operational Safety Review that the Nuclear Explosive Surety Standards are no longer satisfied for an ongoing nuclear explosive operation.	See refs.	Significant threat to Nuclear Explosives safety.	Added.	DOE O 420.1 B DOE O 452.2 D	Attachment 2.
382.	Group 7	(2) 2 The unauthorized introduction of electrical energy into a nuclear explosive.	Deleted.	Incorporated above.		Deleted.		
383.	Group 7	(3) 2 The unauthorized compromise of a nuclear explosive safety feature when installed on a nuclear explosive.	Deleted.	Incorporated above.		Deleted.		
384.	Group 7	(4) 2 Inadvertent substitution of a nuclear explosive for a nuclear explosive-like assembly (NELA) or vice versa.	Deleted.	Incorporated above.		Deleted.		
385.	Group 7	(5) 2 A violation of a nuclear explosive safety rule (NESR).	Deleted.	Incorporated above.		Deleted.		
386.	Group 7	(6) 2 Damage to a training unit during training operations indicative of a hazard to a nuclear explosive.	Deleted.	Incorporated above.		Deleted.		
387.	Group 7	New.	(3) 3 An event during nuclear explosive operations that resulted in an adverse effect on safety, such as: a) use of uncertified	See refs.	Potential threat to Nuclear Explosives Safety.	Added.	DOE O 420.1 B DOE O	Attachment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
			personnel or unauthorized equipment/tooling during a nuclear explosive operation, b) violation of the two-person concept of operations, or c) violation of some other nuclear explosive safety requirement listed in the 452 series of directives other than a NESR.				452.2 D	
388.	Group 7	(7) 3 The use of uncertified personnel or unauthorized equipment/tooling during a nuclear explosive operation.	Deleted.	Incorporated above.		Deleted.		
389.	Group 7	(8) 3 A violation of the two-person concept of operations.	Deleted.	Incorporated above.		Deleted.		
390.	Group 7	(9) 3 Revocation of the Personnel Assurance Program (PAP) certification of an individual (for cause).	Deleted.	This is a security issue and does not belong in ORPS.		Deleted.		
391.	6.3.	Group 8 – Transportation	Group 8 – Transportation				49 CFR Part 171.15	Attach ment 2.
392.	Group 8	New	<u>Sub Group A - Pre-Transportation: Hazardous Materials Packaging and Preparation for Shipping</u>					Attach ment 2.
393.	Group 8	# SC Criterion	# SC Criterion					Attach ment 2.
394.	Group 8	New.	(1) 3 Any deviation that would require a written report to Nuclear Regulatory Commission (per 10 CFR § 171.95) or to DOE HCO/NNSA CO (per DOE 460.1C or DOE 461.1B), namely: a) Instance in which there is a significant reduction in the effectiveness (as defined by the certificate holder) of any approved fissile or Type B packaging during use; b) Discovery of a defect with safety significance (as defined by the certificate holder) in a fissile or Type B packaging, after first use (by any shipper); c) Instance in which the conditions of approval in the Certificate of	See refs.	Aligns with transportation requirements.	New.	49 CFR Part 171.15 DOE O 460.1C DOE O 461.1B	Attach ment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
			Compliance (or equivalent) were not observed in making a shipment.					
395.	Group 8	New.	(2) 3 Deviation from applicable safety significant requirements (with violation Severity Weights of 5 through 10 defined in the DOT CSA 2010 Safety Measurement System Methodology, Appendix A) performed during the preparation of offsite hazardous materials shipments and discovered during shipment in commerce or at the receiving site for any of the reasons listed in 49 CFR § 171.1(b).	See refs.	Aligns with transportation requirements.	New.	49 CFR1 71.1(b)	Attach ment 2.
396.	Group 8	New.	<u>Transportation: Offsite or Onsite Transportation of Hazardous Material by Any Mode of Transportation (e.g., Highway, Rail, Water, Air, and Pipeline)</u>					Attach ment 2.
397.	Group 8	(1) *1 Any offsite transportation incident involving hazardous materials that would require immediate notice pursuant to 49 CFR Part 171.15, namely:	(1) *2 Any offsite transportation incident involving hazardous materials that would require immediate notice pursuant to 49 CFR Part 171.15(b).	See ref.	Threat to public safety.	Moved.	49 CFR Part 171.1 5	Attach ment 2.
398.	Group 8	(a) As a direct result of hazardous materials:	Deleted.	Details for the above criterion are provided in the referenced requirements document.		Deleted.		
399.	Group 8	(i) A person is killed,	Deleted.	Details for the above criterion are provided in the referenced requirements document.		Deleted.		
400.	Group 8	(ii) A person receives injuries requiring hospitalization,	Deleted.	Details for the above criterion are provided in the referenced requirements document.		Deleted.		
401.	Group 8	(iii) Estimated property damage exceeds \$50,000,	Deleted.	Details for the above criterion are provided in the referenced requirements document.		Deleted.		

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
402.	Group 8	(iv) An evacuation of the general public occurs lasting 1 hour or more,	Deleted.	Details for the above criterion are provided in the referenced requirements document.		Deleted.		
403.	Group 8	(v) One or more transportation arteries or facilities are closed or shut down for 1 hour or more, or	Deleted.	Details for the above criterion are provided in the referenced requirements document.		Deleted.		
404.	Group 8	(b) Fire, breakage, spillage, or suspected radioactive contamination occurs involving shipment of radioactive materials, or	Deleted.	Details for the above criterion are provided in the referenced requirements document.		Deleted.		
405.	Group 8	(c) Fire, breakage, spillage, or suspected contamination occurs involving shipment of infectious substances (etiologic agents), or	Deleted.	Details for the above criterion are provided in the referenced requirements document.		Deleted.		
406.	Group 8	(d) There has been a release of a marine pollutant in a quantity exceeding 450 liters (119 gallons) for liquids or 400 kilograms (882 pounds) for solids, or	Deleted.	Details for the above criterion are provided in the referenced requirements document.		Deleted.		
407.	Group 8	(e) The operational flight pattern or routine of an aircraft is altered.	Deleted.	Details for the above criterion are provided in the referenced requirements document.		Deleted.		
408.	Group 8	New.	(2) *3 Any offsite “recordable accident” (per 49 CFR § 390.5) involving a motor vehicle carrying DOE hazardous materials operating on a highway in interstate or intrastate commerce. Note: Prompt notification is not required if the accident does not involve personnel injuries.	See refs.	Aligns with transportation requirements and public safety.	New.	49 CFR 390.5	Attachment 2.
409.	Group 8	New.	(3) 3 Any offsite transportation incident involving DOE hazardous materials that would require submission of a Hazardous Materials Incident Report on DOT Form F 5800.1 pursuant to 49 CFR § 171.16.	See ref.	Aligns with transportation requirements and public safety.	New.	49 CFR 171	Attachment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
410.	Group 8	(2) 3 Any offsite transport of hazardous material, including radioactive material, whose quantity or nature (e.g., physical or chemical composition) is different than intended, such that the receiving organization’s operations were impacted/disrupted or the transport resulted in the initiation of corrective actions by the originating organization.	(6) 4 Any offsite transport of hazardous material, including radioactive material, whose quantity or nature (e.g., physical or chemical composition) is such that it is noncompliant with the receiving facilities Waste Acceptance Criteria (WAC) or other receipt requirements and the receiving organization’s operations were impacted or disrupted (e.g., material cannot be accepted, possessed, or stored at that facility; must be treated or repackaged to be accepted; or exceeds a license or permit limit).	Waste Acceptance Criteria and permits.	Aligns with transportation requirements.			Attach ment 2.
411.	Group 8	(3) 4 Any onsite transport of hazardous material, including radioactive material, whose quantity or nature (e.g., physical or chemical composition) is different than intended, such that the receiving organization’s operations were impacted/disrupted or the transport resulted in the initiation of corrective actions by the originating organization.	(4) 3 Any onsite transport of hazardous material, including radioactive material, whose quantity or nature (e.g., physical or chemical composition) is such that it is noncompliant with the receiving facilities Waste Acceptance Criteria (WAC) or other receipt requirements and the receiving organization’s operations were impacted or disrupted (e.g., material cannot be accepted, possessed, or stored at that facility; must be treated or repackaged to be accepted; or exceeds a license or permit limit).	Waste Acceptance Criteria.	Transportatio n events that impact operations.	Changed and moved.		Attach ment 2.
412.	Group 8	(4) 4 Any packaging or transportation activity involving the onsite release of radioactive materials, etiologic agents, hazardous substances, hazardous waste, or marine pollutants.	(5) 3 Transportation activity for onsite transport resulting in onsite release of radioactive materials, etiologic agents, hazardous substances, hazardous waste, or marine pollutants that is above permitted levels and exceeds the reportable quantities (RQ) specified in 40 CFR Part 302 or 40 CFR	See refs.	Captures non-conforming transportation releases.	Changed and moved.	40 CFR 302 40 CFR 355	Attach ment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
			Part 355.					
413.	Group 8	New.	(7) 4 Deviation from DOE instructions to commercial motor carriers for DOE hazardous materials shipments (e.g., designated route, prohibited route, designated time of the day).	Instructions given carriers by DOE.	Need to capture when carriers are not compliant with DOE requirements.	New.		Attach ment 2.
414.	6.3.	Group 9 - Noncompliance Notifications	Group 9 - Noncompliance Notifications					Attach ment 2.
415.	Group 9	# SC Criterion	# SC Criterion					Attach ment 2.
416.	Group 9	(1) 3 Any enforcement action (other than associated with the Price Anderson Amendment Act) involving 10 or more cited violations, and/or an assessed fine of \$10,000 or more.	Deleted.		Not needed.	Deleted.		Attach ment 2.
417.	Group 9	[Note: This criterion applies to the enforcement action as initially received from the regulator. Thus the enforcement action would still be reportable even if the fine is later reduced below \$10,000 or the number of violations reduced below 10.]	Deleted.			Deleted.		Attach ment 2.
418.	Group 9	(2) 4 Any written notification from an outside regulatory agency that a site/facility is considered to be in noncompliance with a schedule or requirement (e.g., Notice of Violation, Notice of Intent to Sue, Notice of Noncompliance, Warning Letter, Finding of Violation, Finding of Alleged Violation, Administrative Order, or a similar type of notification or enforcement action).	(1) 3 Any written notification from an outside regulatory agency that a site/facility is considered to be in noncompliance with a schedule or requirement (e.g., Notice of Violation, Notice of Intent to Sue, Notice of Noncompliance, Warning Letter, Finding of Violation, Finding of Alleged Violation, Administrative Order, or equivalent notification or enforcement action).	Various rules, laws and regulations.	Generalizes the capture of non-compliance information.	Changed and moved.		Attach ment 2.
419.	Group 9	New	(2) 4 Any packaging or transportation violation of regulations discovered by DOT during onsite inspections or Compliance Reviews results in fines greater than \$5,000 or Unsatisfactory/Conditional Satisfactory ratings. [Note: Noncompliance	Various rules, laws and regulations.	Generalizes the capture of non-compliance information.	New.		Attach ment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
			occurrence reports are to be updated to reflect fines or penalties levied or corrective actions imposed by the outside regulatory agency upon final settlement of any enforcement action undertaken.]					
420.	6.3	Group 10 - Management Concerns/Issues	Group 10 - Management Concerns/Issues					Attach ment 2.
421.	Group 10	# SC Criterion	# SC Criterion					Attach ment 2.
422.	Group 10	(1) 2 Any event resulting in the initiation of a Type A or B accident investigation as categorized by DOE O 225.1A, <i>Accident Investigation</i> .	(1) 2 Any event resulting in the initiation of a Federal Accident Investigation Board, as categorized by DOE O 225.1B, <i>Accident Investigation</i> .	See ref.	Captures events that can result in Federal Accident Investigation s for trending.	Changed and moved.	DOE O 225.1 A	Attach ment 2.
423.	Group 10	[Note: This reporting criterion may raise the significance category of an occurrence already reported under separate criteria. Multiple reporting criteria should be noted when appropriate.]	[Note: This reporting criterion may raise the significance category of an occurrence already reported under separate criteria. Multiple reporting criteria should be noted when appropriate.]	Note to above.	No change.	Moved.		Attach ment 2.
424.	Group 10	(2) 1-4† An event, condition, or series of events that does not meet any of the other reporting criteria, but is determined by the Facility Manager or line management to be of safety significance or of concern to other facilities or activities in the DOE complex. One of the four significance categories should be assigned to the occurrence, based on an evaluation of the potential risks and the corrective actions taken.	(2) 1-4† An event, condition, or series of events that does not meet any of the other reporting criteria, but is determined to be a safety/and or quality assurance concern for that facility or other facilities or activities in the DOE complex. The significance category assigned to the management concern should be based on an evaluation of the potential risks and impact on safe operations.	Follows ISM policy and ISO practice to identify potential hazards and look for weaknesses.	Continues good practice of identifying weaknesses even when there have been no consequences .	Changed and moved.		Attach ment 2.
425.	Group 10	[† Note: An SC 1 occurrence report requires Prompt Notification.]	[† Note: Follow the Prompt Notification requirements identified in the Occurrence Reporting Model (Attachment 4).]	Note to above.		Changed and moved.		Attach ment 2.
426.	Group 10	(3) 1-4† A near miss, where no barrier or only one barrier prevented an event from having a reportable consequence. One of the four significance categories should be assigned to the near miss, based on an evaluation of the potential risks	(3) 1-3† A near miss to an otherwise ORPS reportable event, where something physically happened that was unexpected or unintended and	Follows ISM policy and ISO practice to identify potential hazards and look for weaknesses.	Clarifies the “near miss” category so that there are no SC 4 reports. Only captures events vice	Changed and moved.		Attach ment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
		and the corrective actions taken.	<p>significant consequences were avoided only by chance. The near miss resulted from either:</p> <p>a) no controls or no protective equipment were in place to prevent more severe consequences, or</p> <p>b) the controls or protective equipment were ineffective.</p> <p>The significance category assigned to the near miss should be based on an evaluation of the potential risks and extent of personnel exposure to the hazard.</p>		conditions which are captured in the next criteria. Continues good practice of identifying weaknesses even when there have been no consequences .			
427.	Group 10	[† Note: An SC 1 occurrence report requires Prompt Notification.]	[† Note: Follow the Prompt Notification requirements identified in the Occurrence Reporting Model (Attachment 4).]	Note to above.		Changed and moved.		Attach ment 2.
428.	Group 10	New.	(4) 1-3† A hazardous condition, without a physical event, where no barrier exists to prevent an event that likely would result in a reportable consequence. Examples of reportable hazardous conditions: a) Personnel exposure to an unprotected elevated work surface (e.g., fall hazard); b) Personnel exposure to the fall zone under an elevated/suspended load (unless otherwise appropriately authorized); c) Personnel entry into a permitted-required confined space without appropriate controls; d) Personnel exposure to an improperly shored/sloped trench or excavation hazard; e) Unplanned spill or release of a toxic material or a biohazardous agent (CDC Select Agent) in sufficient quantity that could potentially result in a reportable injury or illness; or	Follows ISM policy and ISO practice to identify potential hazards and look for weaknesses.	Provides a differentiation between events that were a near miss and a condition that could easily lead to an event.	New.		Attach ment 2.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
			f) Personnel exposure to unsecured fluids that could carry blood borne pathogens. The significance category assigned to the condition should be based on an evaluation of the potential risks and the extent of personnel exposure to the hazard.					
429.		New	[[†] Note: Follow the Prompt Notification requirements identified in the Occurrence Reporting Model (Attachment 4).]	Note to above		Added.		
430.	Group 10	(4) *4 Any occurrence that may result in a significant concern by affected state, tribal, or local officials, press, or general population; that could damage the credibility of the Department; or that may result in inquiries to Headquarters.	(5) *4 Any occurrence that may result in a significant concern by affected state, tribal, or local officials, press, or general population; that could damage the credibility of the Department; or that may result in inquiries to Headquarters.	Capture immediate items of interest.	Captures items that may not be otherwise reportable, but represent information needed by the DOE complex or leadership.	Moved.		Attach ment 2.
431.	Group 10	(5) *4 Any occurrence of such significant immediate interest to offsite personnel and organizations that it warrants prompt notification to the DOE Headquarters Operations Center (DOE HQ OC), and which is not already designated elsewhere in this set of reporting criteria to have prompt notification [denoted by having an asterisk (*) next to the significance category].	(6) *4 Any occurrence of such significant immediate interest to offsite personnel and organizations that it warrants prompt notification to the DOE Headquarters Operations Center (DOE HQ OC), and which is not already designated elsewhere in this set of reporting criteria to have prompt notification [denoted by having an asterisk (*) next to the significance category].	Capture immediate items of interest.	Captures items that may not be otherwise reportable, but represent information needed by the DOE complex or leadership.	Moved.		Attach ment 2.
432.	7	Information Security Requirements - Occurrence Reports containing any classified information, Unclassified Controlled Nuclear Information (UCNI), or other controlled information must not be entered into the ORPS database.	Security Requirements - Occurrence Reports containing controlled information must use procedures described in the Occurrence Reporting Model (Attachment 4). Occurrence Reports containing any classified information, Unclassified Controlled Nuclear	Security requirements.	Slight word change.	Changed.		4.b and Attach ment 4 – 1.a.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
			Information (UCNI), or other controlled information must not be entered into the ORPS database.					
433.	7	Facility Managers must ensure that a review is performed prior to ORPS data entry to preclude contamination of the database with classified, UCNI, official use only, or other controlled information.	Deleted.	Security requirements is contained within the requirement above (Attachment 4 – 1.a.		Deleted.		
434.	7	Any ORPS report determined to be classified or controlled by current classification or control guidance must be submitted using the appropriate secure transmission means. However, with the exception of entry into the ORPS database, all other reporting requirements identified in this Manual must be met. An unclassified version of the occurrence report that has been sanitized of all controlled information must be submitted to ORPS within the required time frames specified in Section 5.	All reports determined to be classified or controlled by current classification or control guidance must be submitted in hard copy in accordance with established security requirements and using the appropriate secure transmission means. In addition, an unclassified version of the Occurrence Report that has been sanitized of all controlled information must be submitted to ORPS within the time frames specified in this Order. Specific instructions on the reporting of occurrences via hard copy or the electronic database, the Occurrence Reporting and Processing System (ORPS), are available on the Occurrence Reporting and Processing System homepage.	Security requirements.	Minor word changes.	Changed.		Attach ment 4 – 1.b.
435.	7	Implementing procedures should identify the requirements for distribution of reports containing classified or controlled information. In those instances where UCNI data may still be present in the ORPS database, appropriate security procedures related to the handling of such data need to be followed.	Deleted.	N/A	Security procedures cover this.	Deleted.		
436.	7	[Note: Occurrence reports involving incidents of counterintelligence concern (e.g., foreign persons, governments, organizations, entities or influence) will not be entered or referenced in the ORPS database.]	Occurrence reports involving incidents of counterintelligence concern (e.g., foreign persons, governments, organizations, entities or influence)	Security concerns.	Minor word change.	Changed.		Attach ment 4 – 1.c.

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
			must not be entered or referenced in the ORPS database.					
437.	8	Utilization Of Reportable Occurrence Information.	Deleted.	N/A	Redundant.	Deleted.		
438.	8.1	Operational Database. The Office of Environment, Safety and Health (EH-1) is responsible for maintaining an unclassified central database, the Occurrence Reporting and Processing System (ORPS). Occurrence Report documentation and distribution requirements will be satisfied by utilization of ORPS, with the exception of those involving classified information or UCNI. Reports for occurrences involving classified information or UCNI will be prepared in written form. After the classified information and UCNI is removed, the report must be entered into ORPS.	Deleted.	N/A	Removed as it is redundant with 5.b.(1) and Attachment 4 – 1.	Deleted.		
439.	8.2	Utilization. Each Facility Manager must collect and disseminate to their personnel information from occurrences related to their facilities and similar DOE facilities. This information includes both lessons learned and good practices. Each Facility Manager should use this information for trending and analysis and for early identification and correction of deteriorating conditions.	Deleted.	N/A	Removed. This type of function is covered by ISM, O 210.2, 226.1A, and 414.1C	Deleted.		
440.	8.2	One of the major purposes of this reporting system is to provide feedback of safety and operational information identified in the Occurrence Reports to other DOE facilities. In addition, Headquarters oversight and assessment organizations should use ORPS information to prepare Safety Notices and other feedback documents. These uses are dependent on the quality of the information reported, which means the information should be thorough and accurate. To this end, Occurrence Reports should contain sufficient information about the facility operations and the occurrence to facilitate action by other personnel who are unfamiliar with details of the facility, equipment, process, or procedures.	Deleted.	N/A	Removed. This type of function is covered by ISM, O 210.2, 226.1A, and 414.1C	Deleted.		

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
441.	8.2	Operations and engineering units, as well as other support organizations, should be involved in the identification and assessment of reportable occurrences. Site information, such as operations logs and engineering evaluations, should be used in this process.	Deleted.	N/A	Everyone should be involved. This expectation is captured by 4.a.	Deleted.		
442.	8.2	Engineering judgment should be used during the review of events and conditions to ensure that precursors to occurrences are identified and reported. An occurrence that is not serious, given the conditions under which it happened, might under different initial conditions be a precursor to a serious event at the same or other facilities.	Deleted.	N/A	Removed because evaluation of events for reportability is addressed in reporting criteria and O 226. Subreportabl es are addressed by 226 and 414.	Deleted.		
443.	9	Implementing Procedures. - Contractors at facilities must develop and maintain implementing procedures for the occurrence reporting and utilization requirements stated in this Manual within 90-days of the requirements in the Contractor Requirements Document being incorporated into their contracts. For DOE-owned and -operated facilities, the responsible DOE organization must implement the requirements of this Manual within 90-days of the Manual approval date.	Deleted.	N/A	Redundant with ISM and 414	Deleted.		
444.	Section 10	INSTRUCTIONS FOR COMPLETING AN OCCURRENCE REPORT.	Deleted.	N/A		Deleted.		
445.	10	Specific instructions on the reporting of occurrences via hard copy or the electronic database, the Occurrence Reporting and Processing System (ORPS), are listed in DOE G 231.1-1, <i>Occurrence Reporting and Performance Analysis Guide</i> . The documentation and distribution requirements of this Manual will be satisfied by utilization of ORPS. All reports containing classified information or Unclassified Controlled Nuclear Information (UCNI) must be submitted in hard copy in accordance with established security requirements (see Section 7). In addition, an unclassified version of the Occurrence Report that has been sanitized of all controlled information must be submitted to ORPS within the time frames specified in Section 5.	Occurrence reports involving incidents of counterintelligence concern (e.g., foreign persons, governments, organizations, entities or influence) must not be entered or referenced in the ORPS database.	Security concerns.	Reduced the requirement. The Guide no longer exists.	Changed and moved.		Attach ment 4 – 1.c.
446.	Section 11	OCCURRENCE REPORTING MODEL AND CAUSAL ANALYSIS TREE	OCCURRENCE REPORTING MODEL AND CAUSAL ANALYSIS TREE	Contains information formerly in the text of the order. Necessary	Made some minor changes to the Occurrence Reporting	Changed and moved.		Attach ments 4 and 5

#	M 231.1-2 Parag	Current Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 Parag
				information to implement the ORPS process.	Model. No changes to the Causal Analysis Tree.			
447.	Section 12	References	References	DOE O 251.1C	Revised as needed.	Revised.		6.a-w.
448.	Section 13	Definitions	Definitions	DOE O 251.1C	Necessary.	Revised as needed.		Attach ment 6
		End of document.						